

PART 70 OPERATING PERMIT OFFICE OF AIR MANAGEMENT

**Avery Dennison MFD
270 West Meadow Place
Lowell, Indiana 46356**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 and 326 IAC 2-1-3.2 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T089-7463-00407	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Management	Issuance Date:

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SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a stationary vinyl coated manufacturing operation.

Responsible Official:	Heinz Pichler, Vice President, Worldwide Graphics
Source Address:	270 West Meadow Place, Lowell, Indiana 46356
Mailing Address:	270 West Meadow Place, Lowell, Indiana 46356
SIC Code:	3089
County Location:	Lake
County Status:	Severe Nonattainment for Ozone, Attainment for all other criteria pollutants
Source Status:	Part 70 Permit Program Major Source, under Emission Offset Rules; Major Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

- (1) One (1) pressure-sensitive vinyl rollcoating line, installed on July 1, 1980, identified as L-1, with maximum capacity of 24,750 square feet per hour, using one (1) 6.9 million British thermal units per hour (mmBtu/hr) natural gas fired thermal oxidizer as VOC control, exhausting to one (1) stack (S-1);
- (2) One (1) pressure-sensitive vinyl rollcoating line, installed on December 1, 1984, identified as L-2, with maximum capacity of 23,063 square feet per hour, using one (1) 9.8 million British thermal units per hour (mmBtu/hr) natural gas fired thermal oxidizer as VOC control, exhausting to one (1) stack (S-2); and
- (3) One (1) pressure-sensitive vinyl/paper rollcoating line, installed on June 1, 1988, identified as L-3, with maximum capacity of 30,750 square feet per hour, using one (1) 11.2 million British thermal units per hour (mmBtu/hr) natural gas fired thermal oxidizer as VOC control, exhausting to one (1) stack (S-3).

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

- (1) VOC and HAP storage tanks with capacities less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons;

- (2) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6;

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22).
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

- (b) The Permittee shall furnish to IDEM, OAM within a reasonable time, any information that IDEM, OAM may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit.
- (c) Upon request, the Permittee shall also furnish to IDEM, OAM copies of records required to be kept by this permit. If the Permittee wishes to assert a claim of confidentiality over any of the furnished records, the Permittee must furnish such records to IDEM, OAM along with a claim of confidentiality under 326 IAC 17. If requested by IDEM, OAM, or the U.S. EPA, to furnish copies of requested records directly to U. S. EPA, and if the Permittee is making a claim of confidentiality regarding the furnished records, then the Permittee must furnish such confidential records directly to the U.S. EPA along with a claim of confidentiality under 40 CFR 2, Subpart B.

B.9 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit constitutes a violation of the Clean Air Act and is grounds for:
 - (1) Enforcement action;
 - (2) Permit termination, revocation and reissuance, or modification; or
 - (3) Denial of a permit renewal application.
- (b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

B.10 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)]

- (a) Any application form, report, or compliance certification submitted under this permit shall contain certification by a responsible official of truth, accuracy, and completeness. This certification, and any other certification required under this permit, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, on the attached Certification Form, with each submittal.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

B.11 Annual Compliance Certification [326 IAC 2-7-6(5)]

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The certification shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than April 15 of each year to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
 - (1) The identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was based on continuous or intermittent data;
 - (4) The methods used for determining compliance of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3);
 - (5) Any insignificant activity that has been added without a permit revision;
 - (6) Such other facts, as specified in Sections D of this permit, as IDEM, OAM may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

B.12 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)]
[326 IAC 1-6-3]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within ninety (90) days after issuance of this permit, including the following information on each facility:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond its control, the PMP cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

- (b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that lack of proper maintenance does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) PMP's shall be submitted to IDEM, OAM upon request and shall be subject to review and approval by IDEM, OAM.

B.13 Emergency Provisions [326 IAC 2-7-16]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-7-16.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
 - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
 - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAM within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-888-209-8892 (ask for Office of Air Management,
Compliance Section), or
Telephone Number: 219-881-6712 (ask for Compliance Section)
Facsimile Number: 219-881-6745

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted notice, either in writing or facsimile, of the emergency to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions) for sources subject to this rule after the effective date of this rule. This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAM may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(9) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAM by telephone or facsimile of an emergency lasting more than one (1) hour in compliance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
 - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
 - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
 - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
 - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value.

Any operation shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

B.14 Permit Shield [326 IAC 2-7-15]

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- (a) This condition provides a permit shield as addressed in 326 IAC 2-7-15.

- (b) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits. Compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that:
 - (1) The applicable requirements are included and specifically identified in this permit; or
 - (2) The permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable.
- (c) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, including any term or condition from a previously issued construction or operation permit, IDEM, OAM shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (d) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application.
- (e) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
 - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
 - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
 - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
 - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (f) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (g) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAM has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (h) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAM has issued the modification. [326 IAC 2-7-12(b)(8)]

B.15 Multiple Exceedances [326 IAC 2-7-5(1)(E)]

Any exceedance of a permit limitation or condition contained in this permit, which occurs contemporaneously with an exceedance of an associated surrogate or operating parameter established to detect or assure compliance with that limit or condition, both arising out of the same act or occurrence, shall constitute a single potential violation of this permit.

B.16 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within ten (10) calendar days from the date of the discovery of the deviation.

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:

- (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
- (2) An emergency as defined in 326 IAC 2-7-1(12); or
- (3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.
- (4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

- (c) Written notification shall be submitted on the attached Emergency/Deviation Occurrence Reporting Form or its substantial equivalent. The notification does not need to be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (d) Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this subsection.

**B.17 Permit Modification, Reopening, Revocation and Reissuance, or Termination
[326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]**

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)]

- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAM determines any of the following:

- (1) That this permit contains a material mistake.
- (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.

- (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAM to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAM at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAM may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.18 Permit Renewal [326 IAC 2-7-4]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAM and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

- (b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]
 - (1) A timely renewal application is one that is:
 - (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
 - (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM on or before the date it is due. [326 IAC 2-5-3]
 - (2) If IDEM, OAM upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.
- (c) Right to Operate After Application for Renewal [326 IAC 2-7-3]
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAM takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAM any additional information identified as being needed to process the application.

- (d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]
If IDEM, OAM fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

B.19 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application should be certified by the "responsible official" as defined by 326 IAC 2-7-1(34) only if a certification is required by the terms of the applicable rule

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.20 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12 (b)(2)]

- (a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.
- (b) Notwithstanding 326 IAC 2-7-12(b)(1)(D)(i) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.21 Changes Under Section 502(b)(10) of the Clean Air Act [326 IAC 2-7-20(b)]

The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a) and the following additional conditions:

- (a) For each such change, the required written notification shall include a brief description of the change within the source, the date on which the change will occur, any change in emissions, and any permit term or condition that is no longer applicable as a result of the change.
- (b) The permit shield, described in 326 IAC 2-7-15, shall not apply to any change made under 326 IAC 2-7-20(b).

B.22 Operational Flexibility [326 IAC 2-7-20]

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any approval required by 326 IAC 2-1 has been obtained;
- (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

- (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20(b), (c), or (e) and makes such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAM in the notices specified in 326 IAC 2-7-20(b), (c)(1), and (e)(2).

- (b) For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

- (1) A brief description of the change within the source;
- (2) The date on which the change will occur;
- (3) Any change in emissions; and
- (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAM, or U.S. EPA is required.
- (e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.23 Construction Permit Requirement [326 IAC 2]

Except as allowed by Indiana P.L. 130-1996 Section 12, as amended by P.L. 244-1997, modification, construction, or reconstruction shall be approved as required by and in accordance with 326 IAC 2.

B.24 Inspection and Entry [326 IAC 2-7-6(2)]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, the Permittee shall allow IDEM, OAM, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
 - (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
 - (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
 - (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
 - (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.
- [326 IAC 2-7-6(6)]

- (1) The Permittee may assert a claim that, in the opinion of the Permittee, information removed or about to be removed from the source by IDEM, OAM or an authorized representative, contains information that is confidential under IC 5-14-3-4(a). The claim shall be made in writing before or at the time the information is removed from the source. In the event that a claim of confidentiality is so asserted, neither IDEM, OAM nor an authorized representative, may disclose the information unless and until IDEM, OAM makes a determination under 326 IAC 17-1-7 through 326 IAC 17-1-9 that the information is not entitled to confidential treatment and that determination becomes final. [IC 5-14-3-4; IC 13-14-11-3; 326 IAC 17-1-7 through 326 IAC 17-1-9]
- (2) The Permittee, and IDEM, OAM acknowledge that the federal law applies to claims of confidentiality made by the Permittee with regard to information removed or about to be removed from the source by U.S. EPA. [40 CFR Part 2, Subpart B]

B.25 Transfer of Ownership or Operation [326 IAC 2-1-6] [326 IAC 2-7-11]

Pursuant to 326 IAC 2-1-6 and 326 IAC 2-7-11:

- (a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAM, Permits Branch within thirty (30) days of the change. Notification shall include a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the Permittee and the new owner.
- (b) The written notification shall be sufficient to transfer the permit to the new owner by an administrative amendment pursuant to 326 IAC 2-7-11. The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) IDEM, OAM shall reserve the right to issue a new permit.

B.26 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

- (a) The Permittee shall pay annual fees to IDEM, OAM, within thirty (30) calendar days of receipt of a billing. If the Permittee does not receive a bill from IDEM, OAM the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action, or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAM, Technical Support and Modeling Section), to determine the appropriate permit fee.

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-7-5(1)]

C.1 Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Visible Emissions Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), visible emissions shall meet the following, unless otherwise stated in this permit:

- (a) Visible emissions shall not exceed an average of forty percent (40%) opacity in twenty-four (24) consecutive readings, as determined in 326 IAC 5-1-4.
- (b) Visible emissions shall not exceed sixty percent (60%) opacity for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) in a six (6) hour period.

C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3(a)(2)(A) and (B) are not federally enforceable.

C.4 Incineration [326 IAC 4-2][326 IAC 9-1-2]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2.

C.5 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

C.6 Fugitive Dust Emissions [326 IAC 6-1-11.1]

The Permittee shall be in violation of 326 IAC 6-1-11.1 (Lake County Fugitive Particulate Matter Control Requirements), if the opacity of fugitive particulate emissions exceeds ten percent (10%). The source does not have any fugitive Particulate Matter (PM) emissions and therefore comply with this opacity limit.

C.7 Operation of Equipment [326 IAC 2-7-6(6)]

All air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
 - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (e) Procedures for Asbestos Emission Control
The Permittee shall comply with the emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are mandatory for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

Testing Requirements [326 IAC 2-7-6(1)]

C.9 Performance Testing [326 IAC 3-6]

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing methods approved by IDEM, OAM.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.

- (b) All test reports must be received by IDEM, OAM within forty-five (45) days after the completion of the testing. An extension may be granted by the Commissioner, if the source submits to IDEM, OAM, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

C.10 Compliance Schedule [326 IAC 2-7-6(3)]

The Permittee:

- (a) Has certified that all facilities at this source are in compliance with all applicable requirements; and
- (b) Has submitted a statement that the Permittee will continue to comply with such requirements; and
- (c) Will comply with such applicable requirements that become effective during the term of this permit.

C.11 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment, no more than ninety (90) days after receipt of this permit. If due to circumstances beyond its control, this schedule cannot be met, the Permittee may extend compliance schedule an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.12 Maintenance of Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)]

- (a) In the event that a breakdown of the monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. To the extent practicable, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less frequent than required in Section D of this permit until such time as the monitoring equipment is back in operation. In the case of continuous monitoring, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less than one (1) hour until such time as the continuous monitor is back in operation.
- (b) The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment. In addition, prompt corrective action shall be initiated whenever indicated.

C.13 Monitoring Methods [326 IAC 3]

Any monitoring or testing performed to meet the applicable requirements of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

C.14 Temperature Gauge Specifications

Unless otherwise specified in Section D of this permit, whenever a condition in this permit requires the measurement of temperature drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ($\pm 2\%$) of full scale reading.

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

C.15 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

- (a) The Permittee prepared and submitted written emergency reduction plans (ERPs) consistent with safe operating procedures on December 11, 1996 with the Part 70 Permit Application.
- (b) If the ERP is disapproved by IDEM, OAM the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.
- (c) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.
- (d) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.

- (e) Upon direct notification by IDEM, OAM that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level.
[326 IAC 1-5-3]

C.16 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5][326 IAC 2-7-6] [326 IAC 1-6]

- (a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. This compliance monitoring plan is comprised of:
 - (1) This condition;
 - (2) The Compliance Determination Requirements in Section D of this permit;
 - (3) The Compliance Monitoring Requirements in Section D of this permit;
 - (4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and
 - (5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAM upon request and shall be subject to review and approval by IDEM, OAM. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of :
 - (A) Response steps that will be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and
 - (B) A time schedule for taking such response steps including a schedule for devising additional response steps for situations that may not have been predicted.
- (b) For each compliance monitoring condition of this permit, appropriate response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to perform the actions detailed in the compliance monitoring conditions or failure to take the response steps within the time prescribed in the Compliance Response Plan, shall constitute a violation of the permit unless taking the response steps set forth in the Compliance Response Plan would be unreasonable.
- (c) After investigating the reason for the excursion, the Permittee is excused from taking further response steps for any of the following reasons:
 - (1) The monitoring equipment malfunctioned, giving a false reading. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.

- (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied or;
 - (3) An automatic measurement was taken when the process was not operating; or
 - (4) The process has already returned to operating within "normal" parameters and no response steps are required.
- (d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

**C.17 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]
[326 IAC 2-7-6]**

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAM, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected facility while the corrective actions are being implemented. IDEM, OAM shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAM within thirty (30) days of receipt of the notice of deficiency. IDEM, OAM reserves the authority to use enforcement activities to resolve noncompliant stack tests.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAM that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAM may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected facility.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

C.18 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]

- (a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by April 15 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:
 - (1) Indicate actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);
 - (2) Indicate actual emissions of other regulated pollutants from the source, for purposes of Part 70 fee assessment.

- (b) The annual emission statement covers the twelve (12) consecutive month time period starting December 1 and ending November 30. The annual emission statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

- (c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM on or before the date it is due.

C.19 Monitoring Data Availability [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)]

- (a) With the exception of performance tests conducted in accordance with Section C-Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.
- (b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.
- (c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.
- (d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.
- (e) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.
- (f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.

C.20 General Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-6]

- (a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years and available upon the request of an IDEM, OAM representative, for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner (or local agency) makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner or local agency within a reasonable time.

- (b) Records of required monitoring information shall include, where applicable:
 - (1) The date, place, and time of sampling or measurements;
 - (2) The dates analyses were performed;
 - (3) The company or entity performing the analyses;
 - (4) The analytic techniques or methods used;
 - (5) The results of such analyses; and
 - (6) The operating conditions existing at the time of sampling or measurement.
- (c) Support information shall include, where applicable:
 - (1) Copies of all reports required by this permit;
 - (2) All original strip chart recordings for continuous monitoring instrumentation;
 - (3) All calibration and maintenance records;
 - (4) Records of preventive maintenance shall be sufficient to demonstrate that improper maintenance did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.
- (d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.21 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

- (a) To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a Semi-Annual Compliance Monitoring Report. Any deviation from the requirements and the date(s) of each deviation must be reported.
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM on or before the date it is due.
- (d) Unless otherwise specified in this permit, any semi-annual report shall be submitted within thirty (30) days of the end of the reporting period.
- (e) All instances of deviations as described in Section B- Deviations from Permit Requirements Conditions must be clearly identified in such reports.
- (f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.
- (g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Stratospheric Ozone Protection

C.22 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- (b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

- (1) One (1) pressure-sensitive vinyl rollcoating line, installed on July 1, 1980, identified as L-1, with maximum capacity of 24,750 square feet per hour, using one (1) 6.9 million British thermal units per hour (mmBtu/hr) natural gas fired thermal oxidizer as VOC control, exhausting to one (1) stack (S-1);
- (2) One (1) pressure-sensitive vinyl rollcoating line, installed on December 1, 1984, identified as L-2, with maximum capacity of 23,063 square feet per hour, using one (1) 9.8 million British thermal units per hour (mmBtu/hr) natural gas fired thermal oxidizer as VOC control, exhausting to one (1) stack (S-2);
- (3) One (1) pressure-sensitive vinyl/paper rollcoating line, installed on June 1, 1988, identified as L-3, with maximum capacity of 30,750 square feet per hour, using one (1) 11.2 million British thermal units per hour (mmBtu/hr) natural gas fired thermal oxidizer as VOC control, exhausting to one (1) stack (S-3);

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-5]

- (a) Pursuant to 326 IAC 8-2-5 (Paper Coating Operations), no owner or operator of a facility engaged in the surface coating of pressure sensitive vinyl or paper may cause allow, or permit the discharge into the atmosphere of any volatile organic compound (VOC) in excess of two and nine-tenths (2.9) pounds per gallon of coating, excluding water, delivered to the coating applicator.
- (b) When operating the thermal oxidizer to achieve the limit for 326 IAC 8-2-5, 2.9 pounds of VOC emitted to the atmosphere per gallon of coating less water delivered to the applicator, the thermal oxidizer for line L-3 shall maintain a minimum 95% capture efficiency and 95% destruction efficiency. These efficiencies and the use of the thermal oxidizer are required by 326 IAC 8-1-2(a)(2). Based upon 326 IAC 8-1-2(c) and the overall control efficiency of 90%, the VOC content of the coating shall not exceed 47.85 pounds per gallon of coating solids delivered to the applicator.

D.1.2 Volatile Organic Compounds (VOC) [326 IAC 12] [40 CFR 60.440, Subpart RR]

Pursuant to 40 CFR 60.442(a)(2), the Permittee shall demonstrate a ninety percent (90%) overall Volatile Organic Compound (VOC) emission reduction as calculated over a calendar month for the one (1) pressure-sensitive vinyl rollcoating line (L-2) and the one (1) pressure-sensitive vinyl/paper rollcoating line (L-3).

D.1.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

Compliance Determination Requirements

D.1.4 Compliance Provisions [40 CFR 60.443, Subpart RR]

Pursuant to 40 CFR 60.443:

- (a) To determine compliance with § 60.442(a)(2), the Permittee shall calculate the required overall Volatile Organic Compound (VOC) emission reduction for the one (1) pressure-sensitive vinyl rollcoating line (L-2) and the one (1) pressure-sensitive vinyl/paper rollcoating line (L-3) according to the following equation:

$$R_q = (G - 0.20) / G * 100$$

where:

G = the calculated weighted average pound of Volatile Organic Compound (VOC) per pound of coating solids applied each calendar month.

If R_q is less than or equal to 90 percent, then the required overall Volatile Organic Compound (VOC) emission reduction is R_q . If R_q is greater than 90 percent, then the required overall Volatile Organic Compound (VOC) emission reduction is 90 percent.

- (b) The Permittee shall determine calendar monthly compliance for the one (1) pressure-sensitive vinyl rollcoating line (L-2) and the one (1) pressure-sensitive vinyl/paper rollcoating line (L-3) by comparing the monthly required overall Volatile Organic Compound (VOC) emission reduction R_q to the overall Volatile Organic Compound (VOC) emission reduction demonstrated in the most recent performance test which complied with § 60.442(a)(2). If the monthly required overall Volatile Organic Compound (VOC) emission reduction is less than or equal to the overall Volatile Organic Compound (VOC) reduction of the most recent performance test, the affected facility is in compliance with § 60.442(a)(2).
- (c) The Permittee shall continuously record the destruction device combustion temperature for the one (1) pressure-sensitive vinyl rollcoating line (L-2) and the one (1) pressure-sensitive vinyl/paper rollcoating line (L-3) during coating operations for thermal incineration destruction devices. The Permittee shall record all 3-hour periods (during actual coating operations) during which the average temperature of the device is more than 28°C (50°F) below the average temperature of the device during the most recent performance test complying with § 60.442(a)(2).
- (d) After the initial performance test required for the one (1) pressure-sensitive vinyl rollcoating line (L-2) and the one (1) pressure-sensitive vinyl/paper rollcoating line (L-3) under § 60.8, compliance with the Volatile Organic Compound (VOC) emission reduction limitation and percentage reduction requirements under § 60.442 is based on the average emission reduction for one calendar month. A separate compliance test is completed at the end of each calendar month after the initial performance test, and a new calendar month's average Volatile Organic Compound (VOC) emission reduction is calculated to show compliance with the standard.
- (e) Startups and shutdowns are normal operations for the one (1) pressure-sensitive vinyl rollcoating line (L-2) and the one (1) pressure-sensitive vinyl/paper rollcoating line (L-3). Emissions from these operations are to be included when determining if the standard specified at § 60.442(a)(2) is being attained.

D.1.5 Testing Requirements [40 CFR 60.444, Subpart RR]

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- (a) Pursuant to 40 CFR 60.444, Subpart RR, the performance test for the one (1) pressure-sensitive vinyl rollcoating line (L-2) and the one (1) pressure-sensitive vinyl/paper rollcoating line (L-3) shall be determined by averaging the results of three test runs as specified in § 60.8(f).

- (1) Determine for each affected facility prior to each test run the weighted average mass of Volatile Organic Compound (VOC) per mass of coating solids applied being used at the facility. The weighted average shall be determined as specified in § 60.443(a). In this application, the quantities of W_{ci} , W_{si} , and M_{ci} shall be determined for the time period of each test run and not a calendar month as specified in § 60.441.
- (2) Calculate the required percent overall Volatile Organic Compound (VOC) emission reduction R_q .
- (3) Determine the percent overall Volatile Organic Compound (VOC) emission reduction device by the following equation and procedures:

$$R = [3 Q_{bi} C_{bi} - 3 Q_{aj} C_{aj}] / [3 Q_{bi} C_{bi} + 3 Q_{fk} C_{fk}] * 100$$

where:

- Q_{bi} = the volumetric flow rate of each effluent gas stream (i) entering the emission control device, in dry standard cubic feet per hour.
- C_{bi} = the concentration of Volatile Organic Compound (VOC) (carbon equivalent) in each gas stream (i) entering the emission control device, in parts per million by volume.
- Q_{aj} = the volumetric flow rate of each effluent gas stream (j) exiting the emission control device, in dry standard cubic feet per hour.
- C_{aj} = the concentration of Volatile Organic Compound (VOC) (carbon equivalent) in each gas stream (j) exiting the emission control device, in parts per million by volume.
- Q_{fk} = the volumetric flow rate of each effluent gas stream (k) emitted to the atmosphere, in dry standard cubic feet per hour.
- C_{fk} = the concentration of Volatile Organic Compound (VOC) (carbon equivalent) in each gas stream (k) emitted directly to the atmosphere, in parts per million by volume.
- (A) The Permittee shall construct the overall Volatile Organic Compound (VOC) emission reduction systems to that all volumetric flow rates and total Volatile Organic Compound (VOC) emissions can be accurately determined by the applicable test method and procedures specified in § 60.446(b).
 - (B) The Permittee shall construct a temporary total enclosure around the coating line applicator and flashoff area during the performance test for the purpose of capturing fugitive Volatile Organic Compound (VOC) emissions. If a permanent total enclosure exists in the affected facility prior to the performance test and the Commissioner is satisfied that the enclosure is totally capturing fugitive Volatile Organic Compound (VOC) emissions, then no additional total enclosure will be required for the performance test.
 - (C) For each affected facility where the value of R is greater than or equal to the value of R_q calculated in § 60.443(b), compliance with § 60.442(a)(2) is demonstrated.

- (b) Pursuant to 40 CFR 60.446, Subpart RR:
- (1) Reference Test Method 25 shall be used to determine the Volatile Organic Compound (VOC) concentration in parts per million by volume, of each effluent gas stream entering and exiting the solvent destruction device or its equivalent, and each effluent gas stream emitted directly to the atmosphere for the one (1) pressure-sensitive vinyl rollcoating line (L-2) and the one (1) pressure-sensitive vinyl/paper rollcoating line (L-3). Reference Methods 1, 2, 3, and 4 shall be used to determine the sampling location, volumetric flow rate, molecular weight, and moisture of all sampled gas streams. For Reference Method 25 and 25A, the sampling time for each of three runs must be at least 1 hour. The minimum sampling volume must be 0.003 dscm except that shorter sampling times or smaller volumes, when necessitated by process variables or other factors, may be approved by the Commissioner.
 - (2) If the Permittee can demonstrate to the Commissioner's satisfaction that testing of representative stacks yields results comparable to those that would be obtained by testing all stacks, the Commissioner will approve testing of representative stacks on a case-by-case basis.

D.1.6 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Condition D.1.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3)(A) and 326 IAC 8-1-2(a)(7) using formulation data supplied by the coating manufacturer. IDEM, OAM, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.7 Volatile Organic Compound (VOC) [40 CFR 60.445, Subpart RR]

Pursuant to 40 CFR 60.445, the Permittee shall install, calibrate, maintain, and operate a monitoring device which continuously indicates and records the temperature of the solvent destruction device's exhaust gases for the one (1) pressure-sensitive vinyl rollcoating line (L-2) and the one (1) pressure-sensitive vinyl/paper rollcoating line (L-3). The monitoring device shall have an accuracy of the greater of ± 0.75 percent of the temperature being measured expressed in degrees Celsius or $\pm 2.5^{\circ}\text{C}$.

D.1.8 Thermal Oxidizer

To ensure compliance with Conditions D.1.1 and D.1.2, the Line 2 and Line 3 thermal oxidizers shall operate at all times that the two (2) rollcoating lines are operated. When operating, the thermal incinerator shall maintain a minimum operating temperature of 1,083 °F for Line 2 and 1,273 °F for Line 3 or a temperature, fan amperage, or duct velocity determined in the compliance tests to maintain an overall 90% control efficiency.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.9 Record Keeping Requirements

-
- (a) To document compliance with Condition D.1.1, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken daily and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.1.

- (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (2) A log of the dates of use;
 - (3) The volume weighted VOC content of the coatings used for each day;
 - (4) The cleanup solvent usage for each day;
 - (5) The total VOC usage for each day; and
 - (6) The weight of VOCs emitted for each compliance period.
- (b) Pursuant to 40 CFR 60.445:
- (1) The Permittee shall maintain a calendar month record of all coatings used for the one (1) pressure-sensitive vinyl rollcoating line (L-2) and the one (1) pressure-sensitive vinyl/paper rollcoating line (L-3) and the results of the reference test method specified in § 60.446(a) or the manufacturer's formulation data used for determining the Volatile Organic Compound (VOC) content of those coatings.
 - (2) Records of the measurements required by §§ 60.443 and 60.445 must be retained for at least two years following the date of the measurements.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.10 Reporting Requirements [40 CFR 60.447, Subpart RR]

- (a) For the one (1) pressure-sensitive vinyl rollcoating line (L-2) and the one (1) pressure-sensitive vinyl/paper rollcoating line (L-3), the performance test and results from the performance test shall be submitted to the Commissioner as specified in § 60.8(a) of the General Provisions (40 CFR part 60, subpart A).
- (b) Following the initial performance test for the one (1) pressure-sensitive vinyl rollcoating line (L-2) and the one (1) pressure-sensitive vinyl/paper rollcoating line (L-3), the Permittee shall submit quarterly reports to the Commissioner of exceedances of the Volatile Organic Compound (VOC) emission limits specified in § 60.442. If no such exceedances occur during a particular quarter, a report stating this shall be submitted to the Commissioner semi-annually.
- (c) The Permittee shall also submit reports at the frequency specified in § 60.7(c) when the incinerator temperature drops as defined in § 60.443(e). If no such periods occur, the Permittee shall state this in the report.
- (d) The requirements of this subsection remain in force until and unless EPA, in delegating enforcement authority to a State under section 111(c) of the Act, approves reporting requirements or an alternate means of compliance surveillance adopted by such States. In that event, affected sources within the State will be relieved of the obligation to comply with this subsection, provided that they comply with the requirements established by the State.

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]
(Insignificant Activity) VOC and HAP storage tanks with capacities less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons;

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.1 Volatile Organic Compounds (VOCs) [326 IAC 8]

Any change or modification to these facilities that would increase potential volatile organic compound (VOC) emissions, as specified in 326 IAC 2-1, must be approved by the Office of Air Management (OAM) before such change or modification can occur.

Compliance Determination Requirements

D.2.2 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the Volatile Organic Compound (VOC) limit specified in Condition D.2.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.2.3 Monitoring

Monitoring of this facility is not required by this permit. However any change or modification to this facility, as specified in 326 IAC 2-1, may require this facility to have monitoring requirements.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.2.4 Record Keeping Requirements

Pursuant to 326 IAC 8-9-6(a) and (b), the Permittee shall maintain the following records for the life of each storage tank:

- (a) The vessel identification number.
- (b) The vessel dimensions.
- (c) The vessel capacity.

SECTION D.3

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]
(Insignificant Activity) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6;

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.3.1 Volatile Organic Compound (VOC) [326 IAC 8-3-2]

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), the owner or operator shall:

- (a) Equip the cleaner with a cover;
- (b) Equip the cleaner with a facility for draining cleaned parts;
- (c) Close the degreaser cover whenever parts are not being handled in the cleaner;
- (d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (e) Provide a permanent, conspicuous label summarizing the operation requirements;
- (f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

D.3.2 Volatile Organic Compound (VOC) [326 IAC 8-3-5]

- (a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaner degreaser facility shall ensure that the following control equipment requirements are met:
 - (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
 - (A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F));
 - (B) The solvent is agitated; or
 - (C) The solvent is heated.
 - (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.
 - (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).

- (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
- (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9°C) (one hundred twenty degrees Fahrenheit (120°F)):
 - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
 - (B) A water cover when solvent is used is insoluble in, and heavier than, water.
 - (C) Other systems of demonstrated equivalent control such as a refrigerated chiller or carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility shall ensure that the following operating requirements are met:
 - (1) Close the cover whenever articles are not being handled in the degreaser.
 - (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
 - (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

Compliance Determination Requirements

D.3.3 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the Volatile Organic Compound (VOC) limits specified in Conditions D.3.1 and D.3.2 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.3.4 Monitoring

Monitoring of this facility is not required by this permit. However, any change or modification to this facility, as specified in 326 IAC 2-1, may require this facility to have monitoring requirements.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT
CERTIFICATION**

Source Name: Avery Dennison MFD
Source Address: 270 West Meadow Place, Lowell, Indiana 46356
Mailing Address: 270 West Meadow Place, Lowell, Indiana 46356
Part 70 Permit No.: T089-7463-00407

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

- 9 Annual Compliance Certification Letter
- 9 Test Result (specify) _____
- 9 Report (specify) _____
- 9 Notification (specify) _____
- 9 Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION
P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967

PART 70 OPERATING PERMIT
EMERGENCY/DEVIATION OCCURRENCE REPORT

Source Name: Avery Dennison MFD
Source Address: 270 West Meadow Place, Lowell, Indiana 46356
Mailing Address: 270 West Meadow Place, Lowell, Indiana 46356
Part 70 Permit No.: T089-7463-00407

This form consists of 2 pages

Page 1 of 2

Check either No. 1 or No.2

- 9** 1. This is an emergency as defined in 326 IAC 2-7-1(12)
C The Permittee must notify the Office of Air Management (OAM), within four **(4)** business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
C The Permittee must submit notice in writing or by facsimile within two **(2)** days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16
- 9** 2. This is a deviation, reportable per 326 IAC 2-7-5(3)(c)
C The Permittee must submit notice in writing within ten **(10)** calendar days

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:

Control Equipment:

Permit Condition or Operation Limitation in Permit:

Description of the Emergency/Deviation:

Describe the cause of the Emergency/Deviation:

If any of the following are not applicable, mark N/A

Page 2 of 2

Date/Time Emergency/Deviation started:
Date/Time Emergency/Deviation was corrected:
Was the facility being properly operated at the time of the emergency/deviation? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency/deviation:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____
Title / Position: _____
Date: _____
Phone: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT
SEMIANNUAL COMPLIANCE MONITORING REPORT**

Source Name: Avery Dennison MFD
Source Address: 270 West Meadow Place, Lowell, Indiana 46356
Mailing Address: 270 West Meadow Place, Lowell, Indiana 46356
Part 70 Permit No.: T089-7463-00407

Months: _____ to _____ Year: _____

This report is an affirmation that the source has met all the compliance monitoring requirements stated in this permit. This report shall be submitted semi-annually. Any deviation from the compliance monitoring requirements and the date(s) of each deviation must be reported. Additional pages may be attached if necessary. This form can be supplemented by attaching the Emergency/Deviation Occurrence Report. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD.

Compliance Monitoring Requirement (e.g. Permit Condition D.1.3)	Number of Deviations	Date of each Deviation

Form Completed By: _____
Title/Position: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management

Office of Air Management

Technical Support Document (TSD) for a Part 70 Operating Permit

Source Background and Description

Source Name: Avery Dennison MFD
Source Location: 270 West Meadow Place, Lowell, Indiana 46356
County: Lake
SIC Code: 3089
Operation Permit No.: T089-7463-00407
Permit Reviewer: Cathie Moore

The Office of Air Management (OAM) has reviewed a Part 70 permit application from Avery Dennison MFD relating to the operation of a vinyl coated manufacturing operation.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

- (1) One (1) pressure-sensitive vinyl rollcoating line, installed on July 1, 1980, identified as L-1, with maximum capacity of 24,750 square feet per hour, using one (1) 6.9 million British thermal units per hour (mmBtu/hr) natural gas fired thermal oxidizer as VOC control, exhausting to one (1) stack (S-1);
- (2) One (1) pressure-sensitive vinyl rollcoating line, installed on December 1, 1984, identified as L-2, with maximum capacity of 23,063 square feet per hour, using one (1) 9.8 million British thermal units per hour (mmBtu/hr) natural gas fired thermal oxidizer as VOC control, exhausting to one (1) stack (S-2);
- (3) One (1) pressure-sensitive vinyl/paper rollcoating line, installed on June 1, 1988, identified as L-3, with maximum capacity of 30,750 square feet per hour, using one (1) 11.2 million British thermal units per hour (mmBtu/hr) natural gas fired thermal oxidizer as VOC control, exhausting to one (1) stack (S-3); and
- (4) One (1) flexographic printing press, constructed in 1996, identified as 3089, with maximum line speed of 500 feet per minute and printing width of 60 inches.

Unpermitted Emission Units and Pollution Control Equipment Requiring ENSR

There are no unpermitted facilities operating at this source during this review process.

New Emission Units and Pollution Control Equipment Requiring ENSR

There are no new facilities to be reviewed under the ENSR process.

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (1) Four (4) natural gas fired unit heaters, each with maximum heat input capacity of 0.1 million British thermal units per hour (mmBtu/hr);

- (2) Six (6) natural gas fired unit heaters, each with maximum heat input capacity of 0.15 million British thermal units per hour (mmBtu/hr);
- (3) Six (6) natural gas fired space heaters, each with maximum heat input capacity of 0.1 million British thermal units per hour (mmBtu/hr);
- (4) VOC and HAP storage tanks with capacities less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons;
- (5) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6;
- (6) Closed loop heating and cooling systems;
- (7) Solvent recycling systems with batch capacity less than or equal to 100 gallons;
- (8) Paved and unpaved roads and parking lots with public access;
- (9) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks and fluid handling equipment;
- (10) Blowdown for any of the following: sight glass, boiler; compressors, pumps, and cooling tower;
- (11) On-site fire and emergency response training approved by the department;
- (12) A laboratory as defined in 326 IAC 2-7-1(20)(C);
- (13) Seven (7) small product mixers; and
- (14) Drum washer with closed loop solvent recovery system.

Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

- (1) Registration (no identification number), issued March 10, 1980.
- (2) Registration (no identification number), issued September 10, 1984.
- (3) Registration (no identification number), issued August 25, 1987.
- (4) Construction Permit (CP 089-3586), issued November 7, 1994.
- (5) Exemption (CP 089-4567), issued June 23, 1995, amended on August 25, 1995.
- (6) Registration (CP 089-5110-00407), issued February 26, 1996.

All conditions from previous approvals were incorporated into this Part 70 permit.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the Part 70 permit be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete Part 70 permit application for the purposes of this review was received on December 11, 1996. Additional information was received on March 2, 1998.

A notice of completeness letter was mailed to the source on December 23, 1996.

Emission Calculations

See Appendix A of this document for detailed emissions calculations (one (1) page).

Potential Emissions

Pursuant to 326 IAC 1-2-55, Potential Emissions are defined as "emissions of any one (1) pollutant which would be emitted from a facility, if that facility were operated without the use of pollution control equipment unless such control equipment is necessary for the facility to produce its normal product or is integral to the normal operation of the facility."

Pollutant	Potential Emissions (tons/year)
PM	less than 100
PM-10	less than 100
SO ₂	less than 100
VOC	greater than 250
CO	less than 100
NO _x	less than 100

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAP's	Potential Emissions (tons/year)
Methyl Ethyl Ketone	less than 10
Toluene	greater than 10
Xylene	less than 10
Cumene	less than 10
Vinyl Acetate	less than 10
Hexane	less than 10
Ethyl Benzene	less than 10
TOTAL	less than 25

- (a) The potential emissions (as defined in 326 IAC 1-2-55) of volatile organic compounds (VOC) are equal to or greater than 25 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) The potential emissions (as defined in 326 IAC 1-2-55) of any single HAP is equal to or greater than ten (10) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

- (c) **Fugitive Emissions**
 Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the source's 1995 OAM emission data.

Pollutant	Actual Emissions (tons/year)
PM	0.165
PM-10	0.165
SO ₂	0.033
VOC	31.112
CO	1.100
NO _x	5.500
HAP (Methyl Ethyl Ketone)	3.400
HAP (Toluene)	6.730
HAP (Xylene)	0.630
HAP (Cumene)	0.620
HAP (Vinyl Acetate)	0.150
HAP (Hexane)	0.430
HAP (Ethyl Benzene)	0.010

County Attainment Status

The source is located in Lake County.

Pollutant	Status
TSP	attainment
PM-10	attainment
SO ₂	attainment
NO ₂	attainment
Ozone	severe nonattainment
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) and oxides of nitrogen (Nox) are precursors for the formation of ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to the ozone standards. Lake County has been designated as nonattainment for ozone.

Federal Rule Applicability

- (a) The one (1) pressure-sensitive vinyl rollcoating line (L-1) is not subject to the requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 60.440, Subpart RR), because it was constructed on July 1, 1980 which is prior to the December 30, 1980 applicability date.

- (b) The one (1) pressure-sensitive vinyl rollcoating line (L-2) and the one (1) pressure-sensitive vinyl paper rollcoating line (L-3) are subject to the New Source Performance Standard, 326 IAC 12, (40 CFR 60.440, Subpart RR) because they were constructed on December 1, 1984 and June 1, 1988, respectively which is after the December 30, 1980 applicability date. Pursuant to this subpart, the Permittee shall not discharge into the air in excess of 0.20 pounds volatile organic compound (VOC) per pound of coating solids applied as calculated on a weighted average basis for one calendar month. A compliance test performed according to EPA Method 8260A shall determine compliance with this requirement.
- (c) The one (1) flexographic printing press (3089) is not subject to the requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 60.430, Subpart QQ), because it is not a rotogravure printing press.
- (d) The VOC and HAP storage containers (Insignificant Activity) are not subject to the requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 60.110b, Subpart Kb), because each of their storage capacities is less than forty (40) cubic meters.
- (e) The one (1) flexographic printing press (3089) is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs), 326 IAC 14, (40 CFR 63.820, Subpart KK), because the printing press has no potential hazardous air pollutant (HAP) emissions.
- (f) The degreasing operations (Insignificant Activity) are not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs), 326 IAC 14, (40 CFR 63.460, Subpart T), because they do not use any of the solvents listed in this subpart.

State Rule Applicability - Entire Source

326 IAC 1-6-3 (Preventive Maintenance Plan)

Pursuant to 326 IAC 1-6-3 (Preventive Maintenance Plan), the source is required to submit a Preventive Maintenance Plan (PMP) for the one (1) pressure-sensitive vinyl coating line (L-2) and for the one (1) pressure-sensitive vinyl paper coating line.

326 IAC 1-5-2 (Emergency Reduction Plans)

The source has submitted an Emergency Reduction Plan (ERP) on December 11, 1996 with the Part 70 Permit Application. The ERP has been verified to fulfill the requirements of 326 IAC 1-5-2 (Emergency Reduction Plans).

326 IAC 2-3 (Emission Offset)

Pursuant to 326 IAC 2-3 (Emission Offset), this source is a major source.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than ten (10) tons per year of volatile organic compound (VOC) and located in Lake County. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by April 15 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

326 IAC 5-1 (Visible Emissions Limitations)

Pursuant to 326 IAC 5-1-2 (Visible Emissions Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), visible emissions shall meet the following, unless otherwise stated in this permit:

- (a) Visible emissions shall not exceed an average of twenty percent (20%) opacity in twenty-four (24) consecutive readings as determined by 326 IAC 5-1-4,
- (b) Visible emissions shall not exceed sixty percent (60%) opacity for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) in a six (6) hour period.

State Rule Applicability - Individual Facilities

326 IAC 8-2-5 (Paper Coating Operations)

The two (2) pressure-sensitive vinyl rollcoating lines (L-1 and L-2) and the one (1) pressure-sensitive vinyl paper rollcoating lines are subject to the requirements of 326 IAC 8-2-5 (Paper Coating Operations) because they were constructed in July, 1980, December, 1984, and June 1988 which is after the January 1, 1980 applicability date and each of their potential volatile organic compound (VOC) emissions are greater than twenty-five (25) tons per year.

Pursuant to 326 IAC 8-2-5 (Paper Coating Operations), the Permittee shall not cause, allow, or permit the discharge into the atmosphere of any volatile organic compound (VOC) in excess of two and nine-tenths (2.9) pounds per gallon of coating, excluding water, delivered to the coating applicator from a paper, plastic, metal foil, or pressure sensitive tape/labels coating line.

Based on the MSDS submitted by the source and calculations made, the two (2) pressure-sensitive vinyl rollcoating lines (L-1 and L-2) are in compliance with this requirement. See page one (1) of one (1) of TSD, Appendix A.

The thermal oxidizer for the one (1) pressure-sensitive vinyl paper rollcoating line (L-3) shall be in operation at all times the one (1) pressure-sensitive vinyl paper rollcoating line (L-3) is in operation to ensure compliance with this requirement since the coatings used on this line do not comply with this requirement.

326 IAC 8-5-5 (Graphic Arts Operations)

The one (1) flexographic printing press (3089) is subject to the requirements of 326 IAC 8-5-5(c) (Graphic Arts Operations) because it is located at a source in Lake County with potential volatile organic compound (VOC) emissions greater than twenty-five (25) tons per year. Pursuant to (3)(A) of this rule, the one (1) flexographic printing press is also subject to the requirements of 326 IAC 8-1-9 and 326 IAC 8-1-10. However, the one (1) flexographic printing press is not subject to the requirements of 326 IAC 8-5-5(e) (Graphic Arts Operations) because the potential volatile organic compound (VOC) emissions are less than twenty-five (25) tons per year.

Pursuant to 326 IAC 8-5-5(c) (Graphic Arts Operations), the Permittee shall not cause, allow, or permit the operation of the one (1) flexographic printing press unless the ink, as applied to the substrate, meets an emission limit of five-tenths (0.5) pound of volatile organic compound (VOC) per pound of solids in the ink. The one (1) flexographic printing press is in compliance with this requirement based on the following equation:

The following information was taken from the construction permit application for the flexographic printing press. This printing press was issued Registration (CP 089-5110), on February 26, 1998. The application listed only one type of ink to be used on this press. This ink has the following properties:

Weight Percent VOC of ink = 2.9 %

Weight Percent Solids of ink = 52.1 %

Therefore, $2.9 \% \div 52.1 \% = 0.06 \text{ lb VOC} / \text{lb solids}$

Since 0.06 is less than 0.5, the press is in compliance.

326 IAC 8-1-9 (General Record Keeping and Reporting Requirements)

Pursuant to 326 IAC 8-1-9 (General Record Keeping and Reporting Requirements), the Permittee shall maintain records required by this rule or records necessary to determine compliance with 326 IAC 8-5-5. These records shall be accessible on-site for the most recent three (3) year period and shall be reasonable accessible for an additional two (2) year period.

326 IAC 8-1-10 (Compliance Certification, Record Keeping, and Reporting Requirements for Certain Coating Facilities Using Compliant Coatings)

Pursuant to 326 IAC 8-1-10 (Compliance Certification, Record Keeping, and Reporting Requirements for Certain Coating Facilities Using Compliant Coatings):

- (a) Upon startup of a new coating facility, or upon changing the method of compliance for an existing coating facility from daily-weighted averaging or control devices to the use of compliant coatings, the Permittee of the one (1) flexographic printing press shall certify to the department that the coating facility is in compliance with the requirements of this section. The certification shall include the following:
 - (1) The name and location of the source.
 - (2) The name, address, and telephone number of the person responsible for the source.
 - (3) Identification of each VOC emitting coating facility and identification of the applicable emission limitation.
 - (4) The name and identification number of each coating, as applied, used at each coating facility.
 - (5) The mass of VOC (excluding water and exempt compounds) per volume of coating and the volume of each coating as applied.
- (b) Upon startup of a new coating facility or upon changing the method of compliance for an existing coating facility from daily-weighted averaging or control devices to the use of compliant coatings, the Permittee shall for each coating facility and for each coating used collect and record each day and maintain all of the following information:
 - (1) The name and identification number of each coating, as applied.
 - (2) The mass of VOC (excluding water and exempt compounds) per volume of coating for each coating, as applied, or the VOC content of each coating, as applied, expressed in units necessary to determine compliance.
 - (3) As new compliant coatings are added to a coating facility, the records required by this subsection shall be updated to include the new coating.
 - (4) If use of a coating is discontinued, the records required by this section shall be maintained consistent with section 9(c) of this rule.
- (c) The Permittee shall notify the department in either of the following instances:
 - (1) Any record showing use of any noncompliant coatings shall be reported by submitting a copy of the record to the department within thirty (30) days following use; such record shall also be submitted with the quarterly compliance report. The following information shall accompany each submittal:

- (A) Name and location of the coating facility.
 - (B) Time, date, and duration of the noncompliance.
 - (C) Corrective action taken.
- (2) At least thirty (30) days calendar days before changing the method of compliance from the use of compliant coatings to daily-weighted averaging or control devices, the Permittee shall comply with the requirements of section 11(b) or 12(b) of this rule, respectively. Upon changing the method of compliance for a coating facility from the use of compliant coatings to daily-weighted averaging or control devices, the Permittee shall comply with all requirements of section 11 or 12 of this rule, respectively.

326 IAC 8-3-2 (Cold Cleaner Degreaser Operations)

The degreasing operations (Insignificant Activity) are subject to the requirements of 326 IAC 8-3-2 (Cold Cleaner Degreaser Operations) because they were constructed after the applicability date of January 1, 1980.

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), the owner or operator shall:

- (a) Equip the cleaner with a cover;
- (b) Equip the cleaner with a facility for draining cleaned parts;
- (c) Close the degreaser cover whenever parts are not being handled in the cleaner;
- (d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (e) Provide a permanent, conspicuous label summarizing the operation requirements;
- (f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

326 IAC 8-3-5 (Cold Cleaner Degreasing Operation and Control)

The degreasing operations (Insignificant Activity) are subject to the requirements of 326 IAC 8-3-5 (Cold Cleaner Degreasing Operation and Control) because they are cold cleaners existing as of July 1, 1990 located at a source in Lake County.

- (a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaner degreaser facility shall ensure that the following control equipment requirements are met:
 - (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
 - (A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F));
 - (B) The solvent is agitated; or
 - (C) The solvent is heated.

- (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.
- (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
- (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
- (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9°C) (one hundred twenty degrees Fahrenheit (120°F)):
 - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
 - (B) A water cover when solvent is used is insoluble in, and heavier than, water.
 - (C) Other systems of demonstrated equivalent control such as a refrigerated chiller or carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility shall ensure that the following operating requirements are met:
 - (1) Close the cover whenever articles are not being handled in the degreaser.
 - (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
 - (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

326 IAC 8-9 (Volatile Organic Liquid Storage Tanks)

The VOC and HAP storage tanks (Insignificant Activity) are subject to only the provisions of 326 IAC 8-9-6(a) and (b) because each of their storage capacities are less than thirty-nine thousand (39,000) gallons. Pursuant to 326 IAC 8-9-6(a) and (b), the Permittee shall maintain the following records for the life of each storage tank:

- (a) The vessel identification number.
- (b) The vessel dimensions.
- (c) The vessel capacity.

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAM, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

1. The one (1) pressure-sensitive vinyl rollcoating line (L-2) and one (1) pressure-sensitive vinyl paper rollcoating line (L-3) have applicable compliance monitoring conditions as specified below:
 - (a) The Line 2 and Line 3 thermal oxidizers shall operate at all times that the two (2) rollcoating lines are operated. When operating, the thermal incinerator shall maintain a minimum operating temperature of 1,083 °F for Line 2 and 1,273 °F for Line 3 or a temperature, fan amperage, or duct velocity determined in the compliance tests.

These monitoring conditions are necessary because the thermal oxidizers for the rollcoating lines must operate properly to ensure compliance with 40 CFR 60.440, Subpart RR, 326 IAC 8-2-5 (Paper Coating Operations) and 326 IAC 2-7 (Part 70).

Air Toxic Emissions

Indiana presently requests applicants to provide information on emissions of the 187 hazardous air pollutants (HAPs) set out in the Clean Air Act Amendments of 1990. These pollutants are either carcinogenic or otherwise considered toxic and are commonly used by industries. They are listed as air toxics on the Office of Air Management (OAM) Part 70 Application Form GSD-08.

- (a) This source will emit levels of air toxics greater than those that constitute major source applicability according to Section 112 of the 1990 Clean Air Act Amendments.
- (b) 326 IAC 2-1-3.4 (New Source Toxics Rule) does not apply to this source because there are no new emission units.

Conclusion

The operation of this vinyl coated manufacturing operation shall be subject to the conditions of the attached proposed **Part 70 Permit No. T089-7463-00407**.

Appendix A: Emissions Calculations

VOC and Particulate

From Surface Coating Operations

Page 1 of 1 TSD App A

Company Name: Avery Dennison MFD
Address City IN Zip: 270 West Meadow Place, Lowell, Indiana 46356
Part 70: T089-7463-00407
Pit ID: 089-00407
Reviewer: Cathie Moore
Date: 2/23/98

Material	Density (Lb/Gal)	Weight % Volatile (H2O& Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Vol (solids)	Gal of Mat (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential ton/yr	Lb VOC /gal solids	Transfer Efficiency
Coating Line L-1 (Polyvinyl Chloride)	9.5	30.00%	0.0%	30.0%	0.0%	70.00%	0.00300	24750.000	2.85	2.85	211.39	5073.35	925.89	0.00	4.07	100%
Coating Line L-2 (Polyvinyl Chloride)	9.5	30.00%	0.0%	30.0%	0.0%	70.00%	0.00300	23063.000	2.85	2.85	196.98	4727.55	862.78	0.00	4.07	100%
Paper Coating Line L-3 (Polyvinyl Ester)	7.5	61.50%	0.0%	61.5%	0.0%	38.50%	0.00250	30750.000	4.61	4.61	354.59	8510.06	1553.09	0.00	11.98	100%
Paper Coating Line L-3 (Multipolymer Resin "FX" 2839)	7.8	62.00%	0.0%	62.0%	0.0%	38.00%	0.00263	30750.000	4.86	4.86	393.11	9434.52	1721.80	0.00	12.79	100%
Paper Coating Line L-3 (Multipolymer Resin "P" 2835)	7.8	67.50%	0.0%	67.5%	0.0%	32.50%	0.00284	30750.000	5.24	5.24	457.43	10978.43	2003.56	0.00	16.12	100%
Paper Coating Line L-3 (Multipolymer Resin "FC" 2539)	8.1	66.00%	0.0%	66.0%	0.0%	34.00%	0.00242	30750.000	5.34	5.34	397.33	9535.95	1740.31	0.00	15.70	100%
Paper Coating Line L-3 (Multipolymer Resin "AD" 2837)	7.4	56.00%	0.0%	56.0%	0.0%	44.00%	0.00244	30750.000	4.16	4.16	311.76	7482.35	1365.53	0.00	9.44	100%

State Potential Emissions

Add worst case coating to all solvents

2322.59

55742.22

10172.95

0.00

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)

Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)

Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)

Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)

Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)

Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)

Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)

Total = Worst Coating + Sum of all solvents used

Indiana Department of Environmental Management Office of Air Management

Addendum to the Technical Support Document for Part 70 Operating Permit

Source Name: Avery Dennison MFD
Source Location: 270 West Meadow Place, Lowell, Indiana 46356
County: Lake
SIC Code: 3089
Operation Permit No.: T089-7463-00407
Permit Reviewer: Cathie Moore

On March 18, 1998, the Office of Air Management (OAM) had a notice published in the Gary Post Tribune, Gary, Indiana, stating that Avery Dennison MFD had applied for a Part 70 Operating Permit to operate a vinyl coating operation. The notice also stated that OAM proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On April 21, 1998, Paul L. Hitchcock of Avery Dennison submitted comments on the proposed Part 70 Operating Permit. The summary of the comments is as follows (~~strikeout~~ added to show what was deleted and **bold** added to show what was added):

Comment 1:

Responsible Official, Condition A.1

The Responsible Official listed in Condition A.1 has changed since the Part 70 application was submitted. The responsible official is now Heinz Pichler who is the Vice President, Worldwide Graphics. Please modify Condition A.1 accordingly.

Response to Comment 1:

Condition A.1 "General Information" has been changed to be as follows:

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a stationary vinyl coated manufacturing operation.

Responsible Official: ~~Teddy Chung~~ **Heinz Pichler, Vice President, Worldwide Graphics**
Source Address: 270 West Meadow Place, Lowell, Indiana 46356
Mailing Address: 270 West Meadow Place, Lowell, Indiana 46356
SIC Code: 3089
County Location: Lake
County Status: Severe Nonattainment for Ozone,
 Attainment for all other criteria pollutants
Source Status: Part 70 Permit Program
 Major Source, under Emission Offset Rules;
 Major Source, Section 112 of the Clean Air Act

Comment 2:

Description of Process Equipment, Sections A.2(4) and D.2

The flexographic printing press identified in paragraph (4) of Section A.2, and further addressed in Section D.2 of the permit was permitted in 1996, but was never constructed, and we do not currently plan to install this unit. We would request that this emission unit be eliminated from the Part 70 permit. We realize that if we were to install this unit in the future we would need to resubmit a construction permit application for review by your department.

Technical Support Document

The flexographic printing press (item #4) should be eliminated from the list of facilities on page 1 and the listed of applicable requirements in items (c) and (e) on page 5. The discussion of the requirements of 326 IAC 8-5-5 on page 6 should be removed as well.

Response to Comment 2:

1. Condition A.2 "Emission Units and Pollution Control Equipment Summary" has been changed to be as follows:

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)]
[326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

- (1) One (1) pressure-sensitive vinyl rollcoating line, installed on July 1, 1980, identified as L-1, with maximum capacity of 24,750 square feet per hour, using one (1) 6.9 million British thermal units per hour (mmBtu/hr) natural gas fired thermal oxidizer as VOC control, exhausting to one (1) stack (S-1);
 - (2) One (1) pressure-sensitive vinyl rollcoating line, installed on December 1, 1984, identified as L-2, with maximum capacity of 23,063 square feet per hour, using one (1) 9.8 million British thermal units per hour (mmBtu/hr) natural gas fired thermal oxidizer as VOC control, exhausting to one (1) stack (S-2); **and**
 - (3) One (1) pressure-sensitive vinyl/paper rollcoating line, installed on June 1, 1988, identified as L-3, with maximum capacity of 30,750 square feet per hour, using one (1) 11.2 million British thermal units per hour (mmBtu/hr) natural gas fired thermal oxidizer as VOC control, exhausting to one (1) stack (S-3); **and**.
 - ~~(4) One (1) flexographic printing press, constructed in 1996, identified as 3089, with maximum line speed of 500 feet per minute and printing width of 60 inches.~~
2. Section D.2 "FACILITY OPERATION CONDITIONS" has been deleted from the final permit as follows. The remaining sections of the final permit have been renumbered:

~~SECTION D.2~~ ~~FACILITY OPERATION CONDITIONS~~

(4) One (1) flexographic printing press, constructed in 1996, identified as 3089, with maximum line speed of 500 feet per minute and printing width of 60 inches.
--

~~Emission Limitations and Standards [326 IAC 2-7-5(1)]~~

~~D.2.1 Volatile Organic Compound (VOC) [326 IAC 8-5-5]~~

~~Pursuant to 326 IAC 8-5-5(c) (Graphic Arts Operations), the Permittee shall not cause, allow, or permit the operation of the one (1) flexographic printing press (3089) unless the ink, as applied to the substrate, meets an emission limit of five-tents (0.5) pound of volatile organic compound (VOC) per pound of solids in the ink.~~

Compliance Determination Requirements

~~D.2.2 Testing Requirements [326 IAC 2-7-6(1)]~~

~~Testing of this facility is not specifically required by this permit. However, if testing is required, compliance with the volatile organic compound (VOC) limit specified in Condition D.2.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing. This does not preclude testing requirements on this facility under 326 IAC 2-7-5 and 326 IAC 2-7-6.~~

~~D.2.3 Volatile Organic Compounds (VOC)~~

~~Compliance with the VOC content and usage limitations contained in Condition D.2.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3)(A) and 326 IAC 8-1-2(a)(7) using formulation data supplied by the coating manufacturer. IDEM, OAM, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.~~

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

~~D.2.4 Monitoring~~

~~Monitoring of this facility is not required by this permit. However any change or modification as specified in 326 IAC 2-1 may require this facility to have monitoring requirements.~~

Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

~~D.2.5 Record Keeping Requirements~~

~~(a) Pursuant to 326 IAC 8-1-9 (General Record Keeping and Reporting Requirements), the Permittee shall maintain records required by this rule or records necessary to determine compliance with 326 IAC 8-5-5. These records shall be accessible on-site for the most recent three (3) year period and shall be reasonable accessible for an additional two (2) year period.~~

~~(b) Pursuant to 326 IAC 8-1-10 (Compliance Certification, Record Keeping, and Reporting Requirements for Certain Coating Facilities Using Compliant Coatings):~~

~~(1) Upon startup of a new coating facility, or upon changing the method of compliance for an existing coating facility from daily-weighted averaging or control devices to the use of compliant coatings, the Permittee of the one (1) flexographic printing press shall certify to the department that the coating facility is in compliance with the requirements of this section. The certification shall include the following:~~

~~(A) The name and location of the source.~~

~~(B) The name, address, and telephone number of the person responsible for the source.~~

~~(C) Identification of each VOC emitting coating facility and identification of the applicable emission limitation.~~

~~(D) The name and identification number of each coating, as applied, used at each coating facility.~~

- ~~(E) — The mass of VOC (excluding water and exempt compounds) per volume of coating and the volume of each coating as applied.~~
- ~~(2) — Upon startup of a new coating facility or upon changing the method of compliance for an existing coating facility from daily-weighted averaging or control devices to the use of compliant coatings, the Permittee shall for each coating facility and for each coating used collect and record each day and maintain all of the following information:~~
 - ~~(A) — The name and identification number of each coating, as applied.~~
 - ~~(B) — The mass of VOC (excluding water and exempt compounds) per volume of coating for each coating, as applied, or the VOC content of each coating, as applied, expressed in units necessary to determine compliance.~~
 - ~~(C) — As new compliant coatings are added to a coating facility, the records required by this subsection shall be updated to include the new coating.~~
 - ~~(D) — If use of a coating is discontinued, the records required by this section shall be maintained consistent with section 9(c) of this rule.~~
- ~~(3) — The Permittee shall notify the department in either of the following instances:~~
 - ~~(A) — Any record showing use of any noncompliant coatings shall be reported by submitting a copy of the record to the department within thirty (30) days following use; such record shall also be submitted with the quarterly compliance report. The following information shall accompany each submittal:~~
 - ~~(i) — Name and location of the coating facility.~~
 - ~~(ii) — Time, date, and duration of the noncompliance.~~
 - ~~(iii) — Corrective action taken.~~
 - ~~(B) — At least thirty (30) days calendar days before changing the method of compliance from the use of compliant coatings to daily-weighted averaging or control devices, the Permittee shall comply with the requirements of section 11(b) or 12(b) of this rule, respectively. Upon changing the method of compliance for a coating facility from the use of compliant coatings to daily-weighted averaging or control devices, the Permittee shall comply with all requirements of section 11 or 12 of this rule, respectively.~~
- ~~(c) — To document compliance with Condition D.2.1, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken daily and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.1.~~
 - ~~(1) — The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;~~
 - ~~(2) — A log of the dates of use;~~

- ~~(3) The volume weighted VOC content of the coatings used for each day;~~
 - ~~(4) The cleanup solvent usage for each day;~~
 - ~~(5) The total VOC usage for each day; and~~
 - ~~(6) The weight of VOCs emitted for each compliance period.~~
 - ~~(d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.~~
3. The Technical Support Document, Federal Rule Applicability should be changed to be as follows. However, the Technical Support Document is not physically changed after the Public Notice. Therefore, the changes are noted here in the Addendum to the Technical Support Document:
- (a) The one (1) pressure-sensitive vinyl rollcoating line (L-1) is not subject to the requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 60.440, Subpart RR), because it was constructed on July 1, 1980 which is prior to the December 30, 1980 applicability date.
 - (b) The one (1) pressure-sensitive vinyl rollcoating line (L-2) and the one (1) pressure-sensitive vinyl paper rollcoating line (L-3) are subject to the New Source Performance Standard, 326 IAC 12, (40 CFR 60.440, Subpart RR) because they were constructed on December 1, 1984 and June 1, 1988, respectively which is after the December 30, 1980 applicability date. Pursuant to this subpart, the Permittee shall ~~not discharge into the air in excess of 0.20 pounds volatile organic compound (VOC) per pound of coating solids applied as calculated on a weighted average basis for~~ **demonstrate a ninety percent (90%) overall Volatile Organic Compound (VOC) emission reduction as calculated over** one calendar month. A compliance test performed according to EPA Method ~~8260A~~ **25 and 25A** shall determine compliance with this requirement.
 - ~~(c) The one (1) flexographic printing press (3089) is not subject to the requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 60.430, Subpart QQ), because it is not a rotogravure printing press.~~
 - ~~(d)~~(c) The VOC and HAP storage containers (Insignificant Activity) are not subject to the requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 60.110b, Subpart Kb), because each of their storage capacities is less than forty (40) cubic meters.
 - ~~(e) The one (1) flexographic printing press (3089) is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs), 326 IAC 14, (40 CFR 63.820, Subpart KK), because the printing press has no potential hazardous air pollutant (HAP) emissions.~~
 - ~~(f)~~(d) The degreasing operations (Insignificant Activity) are not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs), 326 IAC 14, (40 CFR 63.460, Subpart T), because they do not use any of the solvents listed in this subpart.
4. The Technical Support Document, State Rule Applicability - Individual Facilities, 326 IAC 8-5-5 (Graphic Arts Operations) and 326 IAC 8-1-10 (Compliance Certification, Record Keeping, and Reporting Requirements for Certain Coating Facilities Using Compliant Coatings) should be deleted as follows. However, the Technical Support Document is not physically changed after the Public Notice. Therefore, the changes are noted here in the Addendum to the Technical Support Document:

~~326 IAC 8-5-5 (Graphic Arts Operations)~~

~~The one (1) flexographic printing press (3089) is subject to the requirements of 326 IAC 8-5-5(c) (Graphic Arts Operations) because it is located at a source in Lake County with potential volatile organic compound (VOC) emissions greater than twenty-five (25) tons per year. Pursuant to (3)(A) of this rule, the one (1) flexographic printing press is also subject to the requirements of 326 IAC 8-1-9 and 326 IAC 8-1-10. However, the one (1) flexographic printing press is not subject to the requirements of 326 IAC 8-5-5(e) (Graphic Arts Operations) because the potential volatile organic compound (VOC) emissions are less than twenty-five (25) tons per year.~~

~~Pursuant to 326 IAC 8-5-5(c) (Graphic Arts Operations), the Permittee shall not cause, allow, or permit the operation of the one (1) flexographic printing press unless the ink, as applied to the substrate, meets an emission limit of five-tenths (0.5) pound of volatile organic compound (VOC) per pound of solids in the ink. The one (1) flexographic printing press is in compliance with this requirement based on the following equation:~~

~~The following information was taken from the construction permit application for the flexographic printing press. This printing press was issued Registration (GP 089-5110), on February 26, 1998. The application listed only one type of ink to be used on this press. This ink has the following properties:~~

~~Weight Percent VOC of ink = 2.9 %~~

~~Weight Percent Solids of ink = 52.1 %~~

~~Therefore, $2.9 \% \div 52.1 \% = 0.06 \text{ lb VOC} / \text{lb solids}$~~

~~Since 0.06 is less than 0.5, the press is in compliance.~~

~~326 IAC 8-1-10 (Compliance Certification, Record Keeping, and Reporting Requirements for Certain Coating Facilities Using Compliant Coatings)~~

~~Pursuant to 326 IAC 8-1-10 (Compliance Certification, Record Keeping, and Reporting Requirements for Certain Coating Facilities Using Compliant Coatings):~~

- ~~(a) Upon startup of a new coating facility, or upon changing the method of compliance for an existing coating facility from daily-weighted averaging or control devices to the use of compliant coatings, the Permittee of the one (1) flexographic printing press shall certify to the department that the coating facility is in compliance with the requirements of this section. The certification shall include the following:~~
- ~~(1) The name and location of the source.~~
 - ~~(2) The name, address, and telephone number of the person responsible for the source.~~
 - ~~(3) Identification of each VOC-emitting coating facility and identification of the applicable emission limitation.~~
 - ~~(4) The name and identification number of each coating, as applied, used at each coating facility.~~
 - ~~(5) The mass of VOC (excluding water and exempt compounds) per volume of coating and the volume of each coating as applied.~~

- ~~(b) Upon startup of a new coating facility or upon changing the method of compliance for an existing coating facility from daily-weighted averaging or control devices to the use of compliant coatings, the Permittee shall for each coating facility and for each coating used collect and record each day and maintain all of the following information:~~
- ~~(1) The name and identification number of each coating, as applied.~~
 - ~~(2) The mass of VOC (excluding water and exempt compounds) per volume of coating for each coating, as applied, or the VOC content of each coating, as applied, expressed in units necessary to determine compliance.~~
 - ~~(3) As new compliant coatings are added to a coating facility, the records required by this subsection shall be updated to include the new coating.~~
 - ~~(4) If use of a coating is discontinued, the records required by this section shall be maintained consistent with section 9(c) of this rule.~~
- ~~(c) The Permittee shall notify the department in either of the following instances:~~
- ~~(1) Any record showing use of any noncompliant coatings shall be reported by submitting a copy of the record to the department within thirty (30) days following use; such record shall also be submitted with the quarterly compliance report. The following information shall accompany each submittal:~~
 - ~~(A) Name and location of the coating facility.~~
 - ~~(B) Time, date, and duration of the noncompliance.~~
 - ~~(C) Corrective action taken.~~
 - ~~(2) At least thirty (30) days calendar days before changing the method of compliance from the use of compliant coatings to daily-weighted averaging or control devices, the Permittee shall comply with the requirements of section 11(b) or 12(b) of this rule, respectively. Upon changing the method of compliance for a coating facility from the use of compliant coatings to daily-weighted averaging or control devices, the Permittee shall comply with all requirements of section 11 or 12 of this rule, respectively.~~

Comment 3:

Specifically Regulated Insignificant Activities, Sections A.3, D.3 and D.4

It was our understanding that insignificant activities listed in our Part 70 permit application would not have specific conditions listed in the permit, unless the emission units were regulated by a specific New Source Performance Standard or National Emission Standard for Hazardous Air Pollutants. We would request that Section A.3 be modified to indicate that there are no specifically regulated insignificant activities, and that sections D.3 and D.4 be deleted from the permit.

Response to Comment 3:

While the VOC and HAP storage tanks and the degreasing operations are not specifically regulated under New Source Performance Standards or National Emission Standards for Hazardous Air Pollutants, they are regulated by state rules, specifically 326 IAC 8-9 for the VOC and HAP storage tanks and 326 IAC 8-3-2 and 326 IAC 8-3-5 for the degreasing operations. Any insignificant activity that has applicable State or Federal requirements shall be included in the Part 70 Operating Permit. There will be no changes to these conditions in the final permit due to this comment.

Comment 4:

Source Operation Condition C.2, Opacity

This condition incorrectly indicates that we are subject to a 20% opacity limit. We believe that the correct limit is 40%, since while we are located in Lake County, we are located source of highway U.S. 30. 326 IAC 5-1-1(c)(4) defines the area of Lake county where the 20% opacity limit applies, which is north of highway U.S. 30.

Technical Support Document

The opacity limit for 326 IAC 5-1 should be amended to 40% on page 6.

Response to Comment 4:

1. Condition C.2(a) "Opacity" has been changed to be as follows:
 - (a) Visible emissions shall not exceed an average of ~~twenty~~ **forty** percent (~~20%~~ **40%**) opacity in twenty-four (24) consecutive readings, as determined in 326 IAC 5-1-4.
2. The Technical Support Document, State Rule Applicability - Entire Source, 326 IAC 5-1 (Visible Emission Limitations) (a) should be changed to be as follows. However, the Technical Support Document is not physically changed after Public Notice. Therefore, the changes are noted here in the Addendum to the Technical Support Document):
 - (a) Visible emissions shall not exceed an average of ~~twenty~~ **forty** percent (~~20%~~ **40%**) opacity in twenty-four (24) consecutive readings, as determined in 326 IAC 5-1-4.

Comment 5:

Source Operation Condition C.17, Compliance Monitoring Plan - Failure to Take Response Steps

We do not believe that 40 CFR Part 70, or 326 IAC 2-7 provides any authority to require the preparation of a Compliance Response Plan (CRP) or to establish the basis for a violation of the permit for failure to conduct the identified response steps. Failure to take specific response steps should not be interpreted in any way as evidence of non-compliance with any underlying applicable requirement, which is implied by this permit condition. We would request that all references to a Compliance Response Plan be eliminated from this condition.

Response to Comment 5:

IDEM has worked with members of the Clean Air Act Advisory Council's Permit Committee, Indiana Manufacturing Association, Indiana Chamber of Commerce and individual applicants regarding the Preventive Maintenance Plan, the Compliance Monitoring Plan and the Compliance Response Plan. IDEM has clarified the preventive maintenance requirements by working with sources on draft language over the past two years. The plans are fully supported by rules promulgated by the Air Pollution Control Board. The plans are the mechanism each permittee will use to verify continuous compliance with its permit and the applicable rules and will form the basis for each permittee's Annual Compliance Certification. Each permittee's ability to verify continuous compliance with its air pollution control requirements is a central goal of the Part 70 permit program.

The regulatory authority for and the essential elements of a compliance monitoring plan were clarified in IDEM's Compliance Monitoring Guidance, in May 1996. IDEM originally placed all the preventive maintenance requirements in the permit section titled "Preventive Maintenance Plan." Under that section the permittee's Preventive Maintenance Plan (PMP) had to set out requirements for the inspection and maintenance of equipment both on a routine basis and in response to monitoring. Routine maintenance was a set schedule of inspections and maintenance of the equipment. The second was inspection and maintenance in response to monitoring that showed that the equipment was not operating in its normal range. This monitoring would indicate that maintenance was required to prevent the exceedance of an emission limit or other permit requirement. The maintenance plan was to set out the "corrective actions" that the permittee would take in the event an inspection indicated an "out of specification situation", and also set out the time frame for taking the corrective action. In addition, the PMP had to include a schedule for devising additional corrective actions for out of compliance situations that the source had not predicted in the PMP. All these plans, actions and schedules were part of the Preventive Maintenance Plan, with the purpose of maintaining the permittee's equipment so that an exceedance of an emission limit or violation of other permit requirements could be prevented.

After issuing the first draft Title V permits on public notice in July of 1997, IDEM received comments from members of the regulated community regarding many of the draft permit terms, including the PMP requirements. One suggestion was that the corrective action and related schedule requirements be removed from the PMP requirement and placed into some other requirement in the permit. This suggestion was based, in some part, on the desire that a permittee's maintenance staff handle the routine maintenance of the equipment, and a permittee's environmental compliance and engineering staff handle the compliance monitoring and steps taken in reaction to an indication that the facility required maintenance to prevent an environmental problem.

IDEM carefully considered this suggestion and agreed to separate the "corrective actions" and related schedule requirements from the PMP. These requirements were placed into a separate requirement, which IDEM named the Compliance Response Plan (CRP). In response to another comment, IDEM changed the name of the "corrective actions" to "response steps." That is how the present CRP requirements became separated from the PMP requirement, and acquired their distinctive nomenclature.

Other comment sought clarification on whether the failure to follow the PMP was violation of the permit. The concern was that a permittee's PMP might call for the permittee to have, for example, three "widget" replacement parts in inventory. If one widget was taken from inventory for use in maintenance, then the permittee might be in violation of the PMP, since there were no longer three widgets in inventory, as required by the PMP. Comments also expressed a view that if a maintenance employee was unexpectedly delayed in making the inspection under the PMP's schedule, for example by the employee's sudden illness, another permit violation could occur, even though the equipment was still functioning properly.

IDEM considered the comments and revised the PMP requirement so that if the permittee fails to follow its PMP, a permit violation will occur only if the lack of proper maintenance causes or contributes to a violation of any limitation on emissions or potential to emit. This was also the second basis for separating the compliance maintenance response steps from the PMP and placing them in the Compliance Response Plan (CRP). Unlike the PMP, the permittee must conduct the required monitoring and take any response steps as set out in the CRP (unless otherwise excused) or a permit violation will occur.

The Compliance Monitoring Plan is made up of the PMP, the CRP, the compliance monitoring and compliance determination requirements in section D of the permit, and the record keeping and reporting requirements in sections C and D. IDEM decided to list all these requirements under this new name, the Compliance Monitoring Plan (CMP), to distinguish them from the PMP requirements. The section D provisions set out which facilities must comply with the CMP requirement. The authority for the CMP provisions is found at 326 IAC 2-7-5(1), 2-7-5(3), 2-7-5(13), 2-7-6(1), 1-6-3 and 1-6-5.

Most permittees already have a plan for conducting preventive maintenance for the emission units and control devices. It is simply a good business practice to have identified the specific personnel whose job duties include inspecting, maintaining and repairing the emission control devices. The emission unit equipment and the emission control equipment may be covered by a written recommendation from the manufacturer set out schedules for the regular inspection and maintenance of the equipment. The permittee will usually have adopted an inspection and maintenance schedule that works for its particular equipment and process in order to keep equipment downtime to a minimum and achieve environmental compliance. The manufacturer may also have indicate, or the permittee may know from experience, what replacement parts should be kept on hand. The permittee may already keep sufficient spare parts on hand so that if a replacement is needed, it can be quickly installed, without a delay in the permittee's business activities and without an environmental violation. For the most part, the PMP can be created by combining present business practices and equipment manufacturer guidance into one document, the Preventive Maintenance Plan (PMP).

The permittee has 90 days to prepare, maintain and implement the PMP. IDEM is not going to draft the PMP. Permittees know their processes and equipment extremely well and are in the best position to draft the PMP. IDEM's air inspectors and permit staff will be available to assist the permittee with any questions about the PMP. IDEM may request a copy of the PMP to review and approve.

The Preventive Maintenance Plan requirement must be included in every applicable Part 70 permit pursuant to 326 IAC 2-7-5(13). This rule refers back to the Preventive Maintenance Plan requirement as described in 326 IAC 1-6-3. This Preventive Maintenance Plan rule sets out the requirements for:

- (1) Identification of the individuals responsible for inspecting, maintaining and repairing the emission control equipment (326 IAC 1-6-3(a)(1)),
- (2) The description of the items or conditions in the facility that will be inspected and the inspection schedule for said items or conditions (326 IAC 1-6-3(a)(2)), and
- (3) The identification and quantification of the replacement parts for the facility which the permittee will maintain in inventory for quick replacement (326 IAC 1-6-3(a)(2)).

It is clear from the structure of the wording in 326 IAC 1-6-3 that the PMP requirement affects the entirety of the applicable facilities. Only 326 IAC 1-6-3(a)(1) is limited, in that it requires identification of the personnel in charge of only the emission control equipment, not any other facility equipment. The commissioner may require changes in the maintenance plan to reduce excessive malfunctions in any control device or combustion or process equipment under 326 IAC 1-6-5.

The CRP requirement of response steps and schedule requirements are another example of documenting procedures most permittees already have developed in the course of good business practices and the prevention of environmental problems. Equipment will often arrive with the manufacturer's trouble shooting guide. It will specify the steps to take when the equipment is not functioning correctly. The steps may involve some initial checking of the system to locate the exact cause, and other steps to place the system back into proper working order. Using the trouble shooting guide and the permittee's own experience with the equipment, the steps are taken in order and as scheduled until the problem is fixed.

A permittee will likely already have a procedure to follow when an unforeseen problem situation occurs. The procedure may list the staff to contact in order to select a course of action, or other step, before the equipment problem creates an environmental violation or interrupts the permittee's business process.

The Compliance Monitoring Plan (CMP) is consistent with IDEM's Compliance Monitoring Guidance released in May of 1996. The guidance discusses corrective action plans setting out the steps to take when compliance monitoring shows an out of range reading. Some of the terminology has changed, as a result of the comments from regulated sources, but the requirements in the permit do not conflict with the guidance. There will be no changes to this condition in the final permit due to this comment.

Comment 6:

Source Operation Condition C.22(a), General Reporting Requirements

This condition requires that we submit a Quarterly Compliance Report, and the reporting form is included as an attachment. 326 IAC 2-7-5(3)(C) requires that periodic compliance reports be submitted at least semi-annually. We would request that this condition and the associated report form be modified to require a semi-annual report, rather than a quarterly report. We do not believe that the compliance requirements of this permit warrant the more frequent reporting frequency.

Response to Comment 6:

Condition C.22 "General Reporting Requirements" and the Compliance Monitoring Report Form has been changed to semi-annual submittal rather than quarterly submittal.

Comment 7:

Facility Operation Condition D.1.2 and D.1.5

Condition D.1.2 requires that Lines 2 and 3 meet an emission limit of 0.20 pounds of VOC per pound of coating solids applied as calculated on a monthly weighted average basis. This limitation is found at 40 CFR 60.442(a)(1). 40 CFR 60.442(a)(2)(i) provides an alternate limit of 90% overall VOC destruction. Since we do comply with this standard through the use of a total enclosure and thermal oxidizer, which meets or exceeds the 90% control requirement, we would request that this be the limitation included in Condition D.1.2. Condition D.1.5 should also be amended accordingly to indicate that compliance with Condition D.1.2 be based on the requirements of 40 CFR 60.443 which contains detailed compliance requirements.

Facility Operation Condition D.1.4, Testing Requirements

We believe that this condition should only apply to Lines L-2 and L-3 and not to line L-1. Line L-1 is only subject to the requirements of 326 IAC 8-2-5. While we do operate a thermal oxidizer on line L-1, we do not need to operate it to demonstrate compliance with 326 IAC 8-2-5, since we use all compliant coatings on this line.

Facility Operation Condition D.1.6, Volatile Organic Compound

In order for this condition to be consistent with the limitations in Condition D.1.1 and D.1.2, we would suggest the following substitute language to replace sections (a) and (b) of this condition: "The thermal oxidizers for the two (2) pressure-sensitive vinyl rollcoating lines (L-2 and L-3) shall be in operation at all times to ensure compliance with 40 CFR 60, Subpart RR and 326 IAC 8-2-5 (Paper Coating Operations)".

Facility Operation Condition D.1.8, Record Keeping Requirements

We do not believe that all of the required record keeping is necessary to demonstrate compliance with the applicable requirements. We will be able to demonstrate compliance for line L-1 with records of VOC content of each of the coating materials used, since all coatings are compliant coatings (i.e. we do not need to use a daily average to demonstrate compliance). For lines L-2 and L-3 we can demonstrate compliance with 326 IAC 8-2-5 by showing that 90 % overall control using our worst case coating shows compliance with the 2.9 lb/gal limit, so that again we do not need to use daily records. The requirements of 40 CFR 60, Subpart RR are met through a monthly weighted average, rather than a daily average. We also can show compliance with this limit based on our worst case coating. This is verified in the calculations contained in Appendix A of the Technical Support Document. Specifically, we would request that the phrase "...taken daily and shall be..." be deleted from the second sentence of D.1.8(a), and that paragraphs (a)(3) through (a)(6) be eliminated from D.1.8(a).

Paragraph (b) of this condition requires that we maintain a log of thermal oxidizer temperatures. We would suggest that the phrase "...for the thermal oxidizers used to control lines L-2 and L-3, consistent with the requirements of 40 CFR 60.443(e)." be added to the end of this condition. This condition should only apply to lines L-2 and L-3, since we do not require the use of the thermal oxidizer on line L-1 to demonstrate compliance. Also Subpart RR contains more specific requirements for recording of the thermal oxidizer temperatures which do not apply to lines L-2 and L-3.

Response to Comment 7:

1. Condition C.14 "Temperature Gauge Specifications" has been changed to be as follows:

C.14 Temperature Gauge Specifications

Unless otherwise specified in Section D of this permit, whenever a condition in this permit requires the measurement of temperature drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent (±2%) of full scale reading.

2. Condition D.1.2 "Volatile Organic Compound" has been changed to be as follows:

D.1.2 Volatile Organic Compounds (VOC) [326 IAC 12] [40 CFR 60.440, Subpart RR]

~~Pursuant to this subpart 40 CFR 60.442(a)(2), the Permittee shall not discharge into the air in excess of 0.20 pounds volatile organic compound (VOC) per pound of coating solids applied as calculated on a weighted average basis for one calendar month~~ **demonstrate a ninety percent (90%) overall Volatile Organic Compound (VOC) emission reduction as calculated over a calendar month** for the one (1) pressure-sensitive vinyl rollcoating line (L-2) and the one (1) pressure-sensitive vinyl/paper rollcoating line (L-3).

3. Condition D.1.4 "Compliance Provisions" has been added to the permit as follows. The remaining conditions of this section have been renumbered:

D.1.4 Compliance Provisions [40 CFR 60.443, Subpart RR]

Pursuant to 40 CFR 60.443:

- (a) **To determine compliance with § 60.442(a)(2), the Permittee shall calculate the required overall Volatile Organic Compound (VOC) emission reduction for the one (1) pressure-sensitive vinyl rollcoating line (L-2) and the one (1) pressure-sensitive vinyl/paper rollcoating line (L-3) according to the following equation:**

$$R_q = (G - 0.20) / G * 100$$

where:

G = the calculated weighted average pound of Volatile Organic Compound (VOC) per pound of coating solids applied each calendar month.

If R_q is less than or equal to 90 percent, then the required overall Volatile Organic Compound (VOC) emission reduction is R_q . If R_q is greater than 90 percent, then the required overall Volatile Organic Compound (VOC) emission reduction is 90 percent.

- (b) The Permittee shall determine calendar monthly compliance for the one (1) pressure-sensitive vinyl rollcoating line (L-2) and the one (1) pressure-sensitive vinyl/paper rollcoating line (L-3) by comparing the monthly required overall Volatile Organic Compound (VOC) emission reduction R_q to the overall Volatile Organic Compound (VOC) emission reduction demonstrated in the most recent performance test which complied with § 60.442(a)(2). If the monthly required overall Volatile Organic Compound (VOC) emission reduction is less than or equal to the overall Volatile Organic Compound (VOC) reduction of the most recent performance test, the affected facility is in compliance with § 60.442(a)(2).
 - (c) The Permittee shall continuously record the destruction device combustion temperature for the one (1) pressure-sensitive vinyl rollcoating line (L-2) and the one (1) pressure-sensitive vinyl/paper rollcoating line (L-3) during coating operations for thermal incineration destruction devices. The Permittee shall record all 3-hour periods (during actual coating operations) during which the average temperature of the device is more than 28° C (50° F) below the average temperature of the device during the most recent performance test complying with § 60.442(a)(2).
 - (d) After the initial performance test required for the one (1) pressure-sensitive vinyl rollcoating line (L-2) and the one (1) pressure-sensitive vinyl/paper rollcoating line (L-3) under § 60.8, compliance with the Volatile Organic Compound (VOC) emission reduction limitation and percentage reduction requirements under § 60.442 is based on the average emission reduction for one calendar month. A separate compliance test is completed at the end of each calendar month after the initial performance test, and a new calendar month's average Volatile Organic Compound (VOC) emission reduction is calculated to show compliance with the standard.
 - (e) Startups and shutdowns are normal operations for the one (1) pressure-sensitive vinyl rollcoating line (L-2) and the one (1) pressure-sensitive vinyl/paper rollcoating line (L-3). Emissions from these operations are to be included when determining if the standard specified at § 60.442(a)(2) is being attained.
4. Condition D.1.4 (now renumbered Condition D.1.5) "Testing Requirements" has been changed to be as follows:

D.1.45 Testing Requirements [40 CFR 60.444, Subpart RR]

~~During the period between 30 and 36 months after issuance of this permit, the Permittee shall perform VOC testing utilizing Method 25, or other methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration.~~

- (a) Pursuant to 40 CFR 60.444, Subpart RR, the performance test for the one (1) pressure-sensitive vinyl rollcoating line (L-2) and the one (1) pressure-sensitive vinyl/paper rollcoating line (L-3) shall be determined by averaging the results of three test runs as specified in § 60.8(f).
 - (1) Determine for each affected facility prior to each test run the weighted average mass of Volatile Organic Compound (VOC) per mass of coating solids applied being used at the facility. The weighted average shall be determined as specified in § 60.443(a). In this application, the quantities of W_{ci} , W_{si} , and M_{ci} shall be determined for the time period of each test run and not a calendar month as specified in § 60.441.

- (2) Calculate the required percent overall Volatile Organic Compound (VOC) emission reduction R_q .
- (3) Determine the percent overall Volatile Organic Compound (VOC) emission reduction device by the following equation and procedures:

$$R = [\sum Q_{bi} C_{bi} - \sum Q_{aj} C_{aj}] / [\sum Q_{bi} C_{bi} + \sum Q_{fk} C_{fk}] * 100$$

where:

- Q_{bi} = the volumetric flow rate of each effluent gas stream (i) entering the emission control device, in dry standard cubic feet per hour.
- C_{bi} = the concentration of Volatile Organic Compound (VOC) (carbon equivalent) in each gas stream (i) entering the emission control device, in parts per million by volume.
- Q_{aj} = the volumetric flow rate of each effluent gas stream (j) exiting the emission control device, in dry standard cubic feet per hour.
- C_{aj} = the concentration of Volatile Organic Compound (VOC) (carbon equivalent) in each gas stream (j) exiting the emission control device, in parts per million by volume.
- Q_{fk} = the volumetric flow rate of each effluent gas stream (k) emitted to the atmosphere, in dry standard cubic feet per hour.
- C_{fk} = the concentration of Volatile Organic Compound (VOC) (carbon equivalent) in each gas stream (k) emitted directly to the atmosphere, in parts per million by volume.
- (A) The Permittee shall construct the overall Volatile Organic Compound (VOC) emission reduction systems to that all volumetric flow rates and total Volatile Organic Compound (VOC) emissions can be accurately determined by the applicable test method and procedures specified in § 60.446(b).
 - (B) The Permittee shall construct a temporary total enclosure around the coating line applicator and flashoff area during the performance test for the purpose of capturing fugitive Volatile Organic Compound (VOC) emissions. If a permanent total enclosure exists in the affected facility prior to the performance test and the Commissioner is satisfied that the enclosure is totally capturing fugitive Volatile Organic Compound (VOC) emissions, then no additional total enclosure will be required for the performance test.
 - (C) For each affected facility where the value of R is greater than or equal to the value of R_q calculated in § 60.443(b), compliance with § 60.442(a)(2) is demonstrated.

(b) Pursuant to 40 CFR 60.446, Subpart RR:

- (1) Reference Test Method 25 shall be used to determine the Volatile Organic Compound (VOC) concentration in parts per million by volume, of each effluent gas stream entering and exiting the solvent destruction device or its equivalent, and each effluent gas stream emitted directly to the atmosphere for the one (1) pressure-sensitive vinyl rollcoating line (L-2) and the one (1) pressure-sensitive vinyl/paper rollcoating line (L-3). Reference Methods 1, 2, 3, and 4 shall be used to determine the sampling location, volumetric flow rate, molecular weight, and moisture of all sampled gas streams. For Reference Method 25 and 25A, the sampling time for each of three runs must be at least 1 hour. The minimum sampling volume must be 0.003 dscm except that shorter sampling times or smaller volumes, when necessitated by process variables or other factors, may be approved by the Commissioner.**
- (2) If the Permittee can demonstrate to the Commissioner's satisfaction that testing of representative stacks yields results comparable to those that would be obtained by testing all stacks, the Commissioner will approve testing of representative stacks on a case-by-case basis.**

5. Condition D.1.5 (now renumbered Condition D.1.6) "Volatile Organic Compound" has been changed to be as follows:

D.1.56 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Conditions D.1.1 and D.1.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3)(A) **326 IAC 8-1-4(a)(3)** and 326 IAC 8-1-2(a)(7) **326 IAC 8-1-2(a)** using formulation data supplied by the coating manufacturer. IDEM, OAM, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

6. Condition D.1.6 (now renumbered Condition D.1.7) "Volatile Organic Compound" has been changed to be as follows:

D.1.67 Volatile Organic Compound (VOC) [40 CFR 60.445, Subpart RR]

~~(a) The thermal oxidizer for the one (1) pressure-sensitive vinyl rollcoating line (L-2) shall be in operation at all times the one (1) pressure-sensitive vinyl rollcoating line (L-2) is in operation to ensure compliance with 40 CFR 60.440, Subpart RR.~~

~~(b) The thermal oxidizer for the one (1) pressure-sensitive vinyl/paper rollcoating line (L-3) shall be in operation at all times the one (1) pressure-sensitive vinyl/paper rollcoating line (L-3) is in operation to ensure compliance with 326 IAC 8-2-5 (Paper Coating Operations).~~

Pursuant to 40 CFR 60.445, the Permittee shall install, calibrate, maintain, and operate a monitoring device which continuously indicates and records the temperature of the solvent destruction device's exhaust gases for the one (1) pressure-sensitive vinyl rollcoating line (L-2) and the one (1) pressure-sensitive vinyl/paper rollcoating line (L-3). The monitoring device shall have an accuracy of the greater of ± 0.75 percent of the temperature being measured expressed in degrees Celsius or $\pm 2.5^{\circ}$ C.

7. Condition D.1.7 (now renumbered Condition D.1.8) "Thermal Oxidizer" has been changed to be as follows:

D.1.78 Thermal Oxidizer

To ensure compliance with Conditions D.1.1 and D.1.2, the Line 2 and Line 3 thermal oxidizers shall operate at all times that the two (2) rollcoating lines are operated. When operating, the thermal incinerator shall maintain a minimum operating temperature of 1,083 °F for Line 2 and 1,273 °F for Line 3 or a temperature, fan amperage, or duct velocity determined in the compliance tests.

8. Condition D.1.8(a) (now renumbered as Condition D.1.9(a)) "Record Keeping Requirements" has been changed to be as follows:
- (a) To document compliance with Conditions ~~D.1.1 and D.1.2~~, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken daily and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Conditions ~~D.1.1 and D.1.2~~.
9. Condition D.1.8(b) (now renumbered as Condition D.1.9(b)) "Record Keeping Requirements" has been changed to be as follows:
- (b) ~~To document compliance with Condition D.1.7, the Permittee shall maintain a log of thermal oxidizer operating temperatures.~~

Pursuant to 40 CFR 60.445:

- (1) **The Permittee shall maintain a calendar month record of all coatings used for the one (1) pressure-sensitive vinyl rollcoating line (L-2) and the one (1) pressure-sensitive vinyl/paper rollcoating line (L-3) and the results of the reference test method specified in § 60.446(a) or the manufacturer's formulation data used for determining the Volatile Organic Compound (VOC) content of those coatings.**
- (2) **Records of the measurements required by §§ 60.443 and 60.445 must be retained for at least two years following the date of the measurements.**
10. Condition D.1.10 "Reporting Requirements" has been added to the permit as follows:

D.1.11 Reporting Requirements [40 CFR 60.447, Subpart RR]

- (a) **For the one (1) pressure-sensitive vinyl rollcoating line (L-2) and the one (1) pressure-sensitive vinyl/paper rollcoating line (L-3), the performance test and results from the performance test shall be submitted to the Commissioner as specified in § 60.8(a) of the General Provisions (40 CFR part 60, subpart A).**
- (b) **Following the initial performance test for the one (1) pressure-sensitive vinyl rollcoating line (L-2) and the one (1) pressure-sensitive vinyl/paper rollcoating line (L-3), the Permittee shall submit quarterly reports to the Commissioner of exceedances of the Volatile Organic Compound (VOC) emission limits specified in § 60.442. If no such exceedances occur during a particular quarter, a report stating this shall be submitted to the Commissioner semi-annually.**
- (c) **The Permittee shall also submit reports at the frequency specified in § 60.7(c) when the incinerator temperature drops as defined in § 60.443(e). If no such periods occur, the Permittee shall state this in the report.**

- (d) **The requirements of this subsection remain in force until and unless EPA, in delegating enforcement authority to a State under section 111(c) of the Act, approves reporting requirements or an alternate means of compliance surveillance adopted by such States. In that event, affected sources within the State will be relieved of the obligation to comply with this subsection, provided that they comply with the requirements established by the State.**

11. The Technical Support Document, Federal Rule Applicability (b) should also be changed to reflect this new method to show compliance. However, the Technical Support Document is not physically changed after Public Notice. Therefore, the changes are noted here in the Addendum to the Technical Support Document.

Upon further review, OAM has made the following changes to the final Part 70 permit (~~strikeout~~ added to show what was deleted and **bold** added to show what was added):

1. The name in the signature block on the cover page has been changed from "Felicia R. George" to Janet G. McCabe".
2. A "Source Summary" has been changed to be as follows:

SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM) ~~and presented in the permit application.~~ **The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.**

3. Condition A.5 "Prior Permit Conditions Superseded" has been deleted as follows:

~~A.5 Prior Permit Conditions Superseded [326 IAC 2]~~

~~The terms and conditions of this permit incorporate all the current applicable requirements for all emission units located at this source, and supersede all terms and conditions in all registrations and permits, including construction permits, issued prior to the date of issuance of this permit. All terms and conditions in such registrations and permits are no longer in effect.~~

4. Condition B.1(b) "Permit No Defense" has been changed to be as follows:
- (b) This prohibition shall not apply to alleged violations of applicable requirements for which the Commissioner has granted a permit shield in accordance with 326 IAC 2-1-3.2 or 326 IAC 2-7-15, **as set out in this permit in the Section B condition entitled "Permit Shield."**
5. Condition B.8(c) "Duty to Supplement and Provide Information" has been changed to be as follows:
- (c) Upon request, the Permittee shall also furnish to IDEM, OAM copies of records required to be kept by this permit. **If the Permittee wishes to assert a claim of confidentiality over any of the furnished records,** ~~For information claimed to be confidential, the Permittee must shall~~ furnish such records to IDEM, OAM along with a claim of confidentiality under 326 IAC 17. If requested by IDEM, OAM, or the U.S. EPA, **to furnish copies of requested records directly to U. S. EPA, and if the Permittee is making a claim of confidentiality regarding the furnished records,** then the Permittee **must** ~~shall~~ furnish such confidential records directly to the U.S. EPA along with a claim of confidentiality under 40 CFR 2, Subpart B.

6. Condition B.11(c) "Annual Compliance Certification" has been changed to be as follows:

- (c) The annual compliance certification report shall include the following:
- (1) The identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was **based on** continuous or intermittent **data**;
 - (4) The methods used for determining compliance of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); ~~and~~
 - (5) Any insignificant activity that has been added without a permit revision; and**
 - ~~(5)~~ **(6)** Such other facts, as specified in Sections D of this permit, as IDEM, OAM may require to determine the compliance status of the source.

The ~~notification which shall be submitted~~ **submittal** by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

7. Condition B.12 "Preventive Maintenance Plan" has been changed to be as follows:

B.12 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)]
[326 IAC 1-6-3]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within ninety (90) days after issuance of this permit, including the following information on each **facility**:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing ~~emission units and associated~~ emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond its control, the PMP cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

**Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015**

- (b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that lack of proper maintenance does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) PMP's shall be submitted to IDEM, OAM upon request and shall be subject to review and approval by IDEM, OAM.

8. Condition B.13(b)(4) "Emergency Provisions" has been changed to be as follows:

- (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAM within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: ~~1-800-451-6027~~ **1-888-209-8892** (ask for Office of Air Management, Compliance Section), or

Telephone Number: ~~317-233-5674~~ **219-881-6712** (ask for Compliance Section)

Facsimile Number: ~~317-233-5967~~ **219-881-6745**

9. Condition B.14 "Permit Shield" has been changed to be as follows:

B.14 Permit Shield [326 IAC 2-7-15]

(a) This condition provides a permit shield as addressed in 326 IAC 2-7-15.

(a) (b) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits. Compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided ~~that either of the following:~~

- (1) The applicable requirements are included and specifically identified in this permit;
or

- (2) ~~IDEM, OAM in acting on the Part 70 permit application or revision, determines in writing that other requirements specifically identified are not applicable to the source, and the Part 70 permit includes the determination or a concise summary thereof.~~ **The permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable.**

(b) (c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, including any term or condition from a previously issued construction or operation permit, IDEM, OAM shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.

(c) (d) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement, IDEM, OAM shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order. No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application.

(d) (e) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:

- (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;

- (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
 - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
 - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- ~~(e)~~ (f) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- ~~(f)~~ (g) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAM has issued the modifications. [326 IAC 2-7-12(c)(7)]
- ~~(g)~~ (h) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAM has issued the modification. [326 IAC 2-7-12(b)(8)]
10. Condition B.16 "Deviations from Permit Requirements and Conditions" has been changed to be as follows:

B.16 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within ten (10) calendar days from the date of the discovery of the deviation.
- (b) **A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:**
 - (1) **An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or**
 - (2) **An emergency as defined in 326 IAC 2-7-1(12); or**
 - (3) **Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.**
 - (4) **Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.**

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.
- ~~(b)~~ (c) Written notification shall be submitted on the attached Emergency/Deviation Occurrence Reporting Form or its substantial equivalent. **The notification does not need to be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).**

(e) (d) Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this subsection.

11. Condition B.18(a) "Permit Renewal" has been changed to be as follows:

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAM and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) **and 326 IAC 2-7-1(40).**

12. Condition B.19 "Administrative Permit Amendment", Condition B.20 "Minor Permit Modification", and Condition B.21 "Significant Permit Modification" have all been combined into one condition numbered Condition B.19 "Permit Amendment or Modification" as follows. The remaining conditions of this section have been renumbered:

~~B.19 — Administrative Permit Amendment [326 IAC 2-7-11]~~

- ~~(a) — An administrative permit amendment is a Part 70 permit revision that makes changes of the type specified under 326 IAC 2-7-11(a).~~
- ~~(b) — An administrative permit amendment may be made by IDEM, OAM consistent with the procedures specified under 326 IAC 2-7-11(c).~~
- ~~(c) — The Permittee may implement the changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]~~

~~B.20 — Minor Permit Modification [326 IAC 2-7-12]~~

- ~~(a) — A permit modification is any revision to this permit that cannot be accomplished as an administrative permit amendment under 326 IAC 2-7-11.~~
- ~~(b) — Minor modification to this permit shall follow the procedures specified under 326 IAC 2-7-12(b), except as provided by 326 IAC 2-7-12(c).~~
- ~~(c) — An application requesting the use of minor modification procedures shall meet the requirements of 326 IAC 2-7-12(b) and shall include the information required in 326 IAC 2-7-12(b)(3)(A) through (E).~~
- ~~(d) — The Permittee may make the change proposed in its minor permit modification application immediately after it files such application provided that the change has received any approval required by 326 IAC 2-1. After the Permittee makes the change allowed under minor permit modification procedures, and until IDEM, OAM takes any of the actions specified in 326 IAC 2-7-12(b)(6)(A) through (C), the Permittee must comply with both the applicable requirements governing the change and the proposed permit terms and conditions. During this period, the Permittee need not comply with the existing permit terms and conditions it seeks to modify. If the Permittee fails to comply with its proposed permit terms and conditions during this time period, the existing permit terms and conditions it seeks to modify may be enforced against it. [326 IAC 2-7-12(b)(7)]~~

~~B.21 — Significant Permit Modification [326 IAC 2-7-12(d)]~~

- ~~(a) — Significant modification procedures shall be used for applications requesting permit modifications that do not qualify as minor permit modifications or as administrative amendments.~~
- ~~(b) — Every significant change in existing monitoring permit terms or conditions and every relaxation of reporting or record keeping permit terms or conditions of this permit shall be considered significant.~~

- ~~(c) Nothing in 326 IAC 2-7-12(d) shall be construed to preclude the Permittee from making changes consistent with 326 IAC 2-7 that would render existing permit compliance terms and conditions irrelevant.~~
- ~~(d) Significant modifications of this permit shall meet all requirements of 326 IAC 2-7, including those for application, public participation, review by affected states, review by the U.S. EPA, and availability of the permit shield, as they apply to permit issuance and renewal.~~

B.19 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.**

- (b) Any application requesting an amendment or modification of this permit shall be submitted to:**

**Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015**

Any such application should be certified by the “responsible official” as defined by 326 IAC 2-7-1(34) only if a certification is required by the terms of the applicable rule.

- (c) The Permittee may implement the administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]**

13. Condition B.26 (now renumbered Condition B.24) “Inspection and Entry” has been changed to be as follows:

B.2624 Inspection and Entry [326 IAC 2-7-6(2)]

Upon presentation of ~~IDEM~~ **proper** identification cards, credentials, and other documents as may be required by law, the Permittee shall allow IDEM, OAM, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;**
- (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;**
- (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;**
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and**
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.**
[326 IAC 2-7-6(6)]

- (1) **The Permittee may assert a claim that, in the opinion of the Permittee, information removed or about to be removed from the source by IDEM, OAM or an authorized representative, contains information that is confidential under IC 5-14-3-4(a). The claim shall be made in writing before or at the time the information is removed from the source. In the event that a claim of confidentiality is so asserted, neither IDEM, OAM nor an authorized representative, may disclose the information unless and until IDEM, OAM makes a determination under 326 IAC 17-1-7 through 326 IAC 17-1-9 that the information is not entitled to confidential treatment and that determination becomes final. [IC 5-14-3-4; IC 13-14-11-3; 326 IAC 17-1-7 through 326 IAC 17-1-9]**
 - (2) **The Permittee, and IDEM, OAM acknowledge that the federal law applies to claims of confidentiality made by the Permittee with regard to information removed or about to be removed from the source by U.S. EPA. [40 CFR Part 2, Subpart B]**
14. Condition B.27(b) (now renumbered Condition B.25(b)) "Transfer of Ownership or Operation" has been changed to be as follows:
 - (b) The written notification shall be sufficient to transfer the permit to the new owner by an administrative amendment pursuant to 326 IAC 2-7-11. **The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).**
15. Condition B.28 (now renumbered Condition B.26) "Annual Fee Payment" has been changed to be as follows:

B.2826 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

- (a) The Permittee shall pay annual fees to IDEM, OAM within thirty (30) calendar days of receipt of a billing. ~~or in a time period consistent with the fee schedule established in 326 IAC 2-7-19. If the Permittee does not receive a bill from IDEM, OAM the applicable fee is due April 1 of each year.~~
 - (b) Failure to pay may result in administrative enforcement action, or revocation of this permit.
 - (c) ~~If the Permittee does not receive a bill from IDEM, OAM, thirty (30) calendar days before the due date,~~ The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAM, Technical Support and Modeling Section), to determine the appropriate permit fee. ~~The applicable fee is due April 1 of each year.~~
16. Condition C.1 "Major Source" has been deleted from the final permit as follows. The remaining conditions have been renumbered:

C.1 Major Source

- ~~Pursuant to 326 IAC 2-3 (Emission Offset), this source is a major source.~~
17. Condition C.1 "Particulate Matter Emission Limitations for Processes with Process Weight Rates Less Than One Hundred pounds per hour" has been added to the permit as follows. The remaining conditions of this section have been renumbered:

C.1 Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

18. Condition C.6 "Fugitive Dust Emissions" has been changed to be as follows:

C.6 Fugitive Dust Emissions [326 IAC 6-1-11.1]

The Permittee shall be in violation of 326 IAC 6-1-11.1 (Lake County Fugitive Particulate Matter Control Requirements), if the opacity of fugitive particulate emissions exceeds ten percent (10%). ~~Compliance with this limitation shall be determined by 40 CFR 60, Appendix A, Method 9. The~~ **source does not have any fugitive Particulate Matter (PM) emissions and therefore comply with this opacity limit.**

19. Condition C.7 "Operation of Equipment" has been changed to be as follows:

C.7 Operation of Equipment [326 IAC 2-7-6(6)]

All air pollution control equipment listed in this permit **and used to comply with an applicable requirement** shall be operated at all times that the emission unit(s) vented to the control equipment are in operation. ~~as described in Section D of this permit.~~

20. Condition C.8 "Asbestos Abatement Projects- Accreditation" and Condition C.15 "Asbestos Abatement Projects" have been combined into one condition as follows:

~~C.8 Asbestos Abatement Projects - Accreditation [326 IAC 14-10] [326 IAC 18]
[40 CFR 61, Subpart M]~~

~~Prior to the commencement of any demolition or renovation activities, the Permittee shall use an Indiana accredited asbestos inspector to inspect thoroughly the affected facility or part of the facility where the demolition or renovation operation will occur for the presence of asbestos, including Category I and Category II nonfriable asbestos containing material. The requirement that the inspector be accredited is federally enforceable.~~

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
 - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or

(C) Waste disposal site.

- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).**
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).**

All required notifications shall be submitted to:

**Indiana Department of Environmental Management
Asbestos Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015**

The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (e) Procedures for Asbestos Emission Control**
The Permittee shall comply with the emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are mandatory for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) Indiana Accredited Asbestos Inspector**
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

21. Condition C.9 "Performance Testing" has been changed to be as follows:

C.9 Performance Testing ~~[326 IAC 3-2-1]~~ [326 IAC 3-6]

- (a) All testing shall be performed according to the provisions of 326 IAC-3-2-1 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing methods approved by IDEM, OAM.**

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

**Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015**

no later than thirty-five (35) days before prior to the intended test date. The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.

- (b) All test reports must be received by IDEM, OAM within forty-five (45) days after the completion of the testing. An extension may be granted by the Commissioner, if the source submits to IDEM, OAM, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.**

The documentation submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

22. Condition C.10 "Compliance Schedule" has been changed to be as follows:

C.10 Compliance Schedule [326 IAC 2-7-6(3)]

The Permittee:

- (a) **Has certified that all facilities at this source are in compliance with all applicable requirements; and** ~~Will continue to comply with such requirements that become effective during the term of this permit; and~~
- (b) Has submitted a statement that the Permittee will continue to comply with such requirements; and
- (c) **Will comply with such applicable requirements that become effective during the term of this permit.** ~~Has certified that all facilities at this source are in compliance with all applicable requirements.~~

23. Condition C.11 (now renumbered Condition C.12) "Compliance Monitoring" has been changed to be as follows:

C.11 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment, no more than ninety (90) days after receipt of this permit. If due to circumstances beyond its control, this schedule cannot be met, the Permittee **may extend compliance schedule an additional ninety (90) days provided the Permittee** ~~shall~~ notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

in writing, **prior to the end of the initial ninety (90) day compliance schedule** ~~no more than ninety (90) days after receipt of this permit, with full justification of the reasons for the inability to meet this date. and a schedule which it expects to meet. If a denial of the request is not received before the monitoring is fully implemented, the schedule shall be deemed approved.~~

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

24. Condition C.13 "Monitoring Methods" has been changed to be as follows:

C.13 Monitoring Methods [326 IAC 3]

Any monitoring or testing performed to meet the **applicable** requirements of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

25. The rule cites of Condition C.17 (now renumbered Condition C.16) "Compliance Monitoring Plan - Failure to Take Response Steps" have been changed to be as follows:

C.4716 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5(3)][326 IAC 2-7-6] [326 IAC 1-6]

26. Condition C.18 (now renumbered Condition C.17) "Actions Related to Noncompliance Demonstrated by a Stack Test" has been changed to be as follows:

**C.4817 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]
[326 IAC 2-7-6]**

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAM, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected facility while the corrective actions are being implemented. IDEM, OAM shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAM within thirty (30) days of receipt of the notice of deficiency. IDEM, OAM reserves the authority to use enforcement activities to resolve noncompliant stack tests.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAM that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAM may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected facility.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

27. Condition C.21(a) (now renumbered Condition C.20(a)) "Emission Statement" has been changed to be as follows:

- (a) The Permittee shall submit ~~an certified~~, annual emission statement **certified pursuant to the requirements of 326 IAC 2-6**, that must be received by April 15 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:

28. The rule cite and (a) of Condition C.21 (now renumbered Condition C.20) "General Record Keeping Requirements" has been changed to be as follows:

C.2420 General Record Keeping Requirements [326 IAC 2-7-5(3)(B)] [326 IAC 2-7-6]

- (a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location **for a minimum of three (3) years** and available **upon the request** ~~within one (1) hour upon verbal request~~ of an IDEM, OAM representative, for a minimum of three (3) years. ~~They~~ **The records** may be stored elsewhere for the remaining two (2) years **as long as they are available upon request** ~~providing they are made available within thirty (30) days after written request~~. **If the Commissioner makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.**

29. Condition C.22 (now renumbered Condition C.21) "General Reporting Requirements" has been changed to be as follows:

C.2221 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

- (a) To affirm that the source has met all the **compliance monitoring** requirements stated in this permit the source shall submit a ~~Quarterly~~ **Semi-Annual Compliance Monitoring Report**. Any deviation from the requirements and the date(s) of each deviation must be reported.

- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM on or before the date it is due.
- (d) Unless otherwise specified in this permit, any ~~quarterly~~ **semi-annual** report shall be submitted within thirty (30) days of the end of the reporting period.

- (e) All instances of deviations **as described in Section B- Deviations from Permit Requirements Conditions** must be clearly identified in such reports. ~~A reportable deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:~~

- ~~(1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or~~
- ~~(2) An emergency as defined in 326 IAC 2-7-1(12); or~~
- ~~(3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.~~
- ~~(4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.~~
- ~~A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred or failure to monitor or record the required compliance monitoring is a deviation.~~

- (f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.
- (g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

30. Condition D.1.1 "Volatile Organic Compounds" has been changed to be as follows:

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-5]

- (a)** Pursuant to 326 IAC 8-2-5 (Paper Coating Operations), ~~the Permittee shall not~~ **no owner or operator of a facility engaged in the surface coating of pressure sensitive vinyl or paper may** cause allow, or permit the discharge into the atmosphere of any volatile organic compound (VOC) in excess of two and nine-tenths (2.9) pounds per gallon of coating, excluding water, delivered to the coating applicator ~~of the two (2) pressure-sensitive vinyl rollcoating lines (L-1 and L-2) and the one (1) pressure-sensitive vinyl/paper coating line (L-3) from a paper, plastic, metal foil, or pressure sensitive tape/labels coating line.~~
- (b)** **When operating the thermal oxidizer to achieve the limit for 326 IAC 8-2-5, 2.9 pounds of VOC emitted to the atmosphere per gallon of coating less water delivered to the applicator, the thermal oxidizer for line L-3 shall maintain a minimum 95% capture efficiency and 95% destruction efficiency. These efficiencies and the use of the thermal oxidizer are required by 326 IAC 8-1-2(a)(2). Based upon 326 IAC 8-1-2(c) and the overall control efficiency of 90%, the VOC content of the coating shall not exceed 47.85 pounds per gallon of coating solids delivered to the applicator.**

31. The equipment listed in Section D.1 "FACILITY OPERATION CONDITIONS" has been changed to be as follows:

Facility Description [326 IAC 2-7-5(15)]

- (1) One (1) pressure-sensitive vinyl rollcoating line, installed on July 1, 1980, identified as L-1, with maximum capacity of 24,750 square feet per hour, using one (1) 6.9 million British thermal units per hour (mmBtu/hr) natural gas fired thermal oxidizer as VOC control, exhausting to one (1) stack (S-1);
- (2) One (1) pressure-sensitive vinyl rollcoating line, installed on December 1, 1984, identified as L-2, with maximum capacity of 23,063 square feet per hour, using one (1) 9.8 million British thermal units per hour (mmBtu/hr) natural gas fired thermal oxidizer as VOC control, exhausting to one (1) stack (S-2);
- (3) One (1) pressure-sensitive vinyl/paper rollcoating line, installed on June 1, 1988, identified as L-3, with maximum capacity of 30,750 square feet per hour, using one (1) 11.2 million British thermal units per hour (mmBtu/hr) natural gas fired thermal oxidizer as VOC control, exhausting to one (1) stack (S-3);

32. Condition D.1.5 (now renumbered Condition D.1.6) "Volatile Organic Compounds" has been changed to be as follows:

D.1.56 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Conditions D.1.1 ~~and D.1.2~~ shall be determined pursuant to ~~326 IAC 8-1-4(a)(3)(A)~~ **326 IAC 8-1-4(a)(3)** and ~~326 IAC 8-1-2(a)(7)~~ **326 IAC 8-1-2(a)** using formulation data supplied by the coating manufacturer. IDEM, OAM, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

33. Condition D.1.7 (now renumbered Condition D.1.8) "Thermal Oxidizer" has been changed to be as follows:

D.1.78 Thermal Oxidizer

To ensure compliance with Conditions D.1.1 and D.1.2, the Line 2 and Line 3 thermal oxidizers shall operate at all times that the two (2) rollcoating lines are operated. When operating, the thermal incinerator shall maintain a minimum operating temperature of 1,083 °F for Line 2 and 1,273 °F for Line 3 or a temperature, fan amperage, or duct velocity determined in the compliance tests **to maintain an overall 90% control efficiency.**

34. The equipment listed in Section D.2 "FACILITY OPERATION CONDITIONS" has been changed to be as follows:

Facility Description [326 IAC 2-7-5(15)]

(Insignificant Activity) VOC and HAP storage tanks with capacities less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons;

35. Condition D.2.2 "Testing Requirements" has been changed to be as follows:

D.2.2 Testing Requirements [326 IAC 2-7-6(1),(6)]

~~Testing of The Permittee is not required to test~~ this facility ~~is not specifically required~~ by this permit. However, **IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance.** If testing is required **by IDEM**, compliance with the Volatile Organic Compound (VOC) limit specified in Condition D.2.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing. ~~This does not preclude testing requirements on this facility under 326 IAC 2-7-5 and 326 IAC 2-7-6.~~

36. The equipment listed in Section D.3 "FACILITY OPERATION CONDITIONS" has been changed to be as follows:

Facility Description [326 IAC 2-7-5(15)]

(Insignificant Activity) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6;

37. Condition D.3.3 "Testing Requirements" has been changed to be as follows:

D.3.3 Testing Requirements [326 IAC 2-7-6(1),(6)]

~~Testing of The Permittee is not required to test~~ this facility ~~is not specifically required~~ by this permit. However, **IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance.** If testing is required **by IDEM**, compliance with the Volatile Organic Compound (VOC) limits specified in Conditions D.3.1 and D.3.2 shall be determined by a performance test conducted in accordance with Section C - Performance Testing. ~~This does not preclude testing requirements on this facility under 326 IAC 2-7-5 and 326 IAC 2-7-6.~~

38. On the Certification Form, the line "Emergency/Deviation Occurrence Reporting Form" has been deleted.
39. On the Emergency/ Deviation Occurrence Reporting Form, the last sentence "Attach a signed certification to complete this report" has been deleted from the bottom of the second page.
40. The Quarterly Compliance Report is now called the Quarterly Compliance Monitoring Report, delete the column marked "No Deviations", and change the language as shown in the following pages.